



JOHN A. PILLAR

Attorney-at-Law
265 Merion Drive
Pittsburgh, Pennsylvania 15228

Phone: 412-343-0970
Fax: 412-343-0971
e-mail: pillarlaw@verizon.net

Hours by Appointment Only at:
603 Washington Road, Ste. 500
Pittsburgh, PA 15228

August 15, 2011

Re: Canterbury International, Inc., t/a
Two Men and a Truck
Docket A-2011-2251336

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

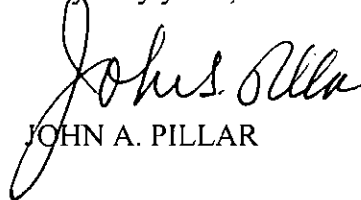
Dear Ms. Chiavetta:

Enclosed is a protest filed on behalf of Debo Moving and Storage, Inc., to the above-captioned application:

A copy of this protest has been served on applicant in accordance with the Commission's Rules of Practice.

Please acknowledge receipt of the enclosures on the duplicate of this letter of transmittal and return it in the stamped, self-addressed envelope provided.

Very truly yours,



JOHN A. PILLAR

sw

Enclosure

cc: Canterbury International, Inc.
t/a Two Men and a Truck
3555 Valley Drive
Pittsburgh, PA 15234
Debo Moving and Storage, Inc.

RECEIVED
2011 AUG 19 AM 10:58
P.U.C.
SECRETARY'S BUREAU

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
2011 AUG 19 AM 10:58
PUBLIC
UTILITY
COMMISSION
SECRETARY'S BUREAU

In re: Application of)
CANTERBURY INTERNATIONAL, INC.,)
t/a TWO MEN AND A TRUCK)
)
)

Docket No. A-2011-2251336

PROTEST

In accordance with the Rules of Practice of the Pennsylvania Public Utility Commission, the carrier named herein desires to protest the above application and, in support thereof, states as follows:

1. The authority sought by this application as published in the Pennsylvania Bulletin of August 6, 2011, is attached hereto as Appendix "A".
2. The name and address of the protestant are set forth in Appendix "B" hereto.
3. The name, address and telephone number of protestant's attorney:

JOHN A. PILLAR, ESQ.
265 Merion Drive
Pittsburgh, PA 15228
412-343-0970

4. Protestant holds authority in conflict with this application as summarized in Appendix "B" attached hereto. A true and correct copy of the pertinent portions of authority held by protestant, or a summary thereof, is attached hereto as Appendix "C".

5. Protestant is presently providing service in the application area and/or is willing and able to provide such service. To the extent of protestant's authority, there is no need or demand for additional service and the proposed service is not necessary or proper for the service, accommodation, convenience or safety of the public. Protestant reserves the right to present

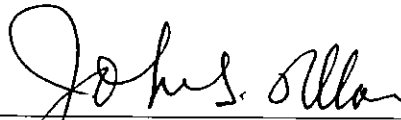
evidence of destructive competition and/or adverse impact which would be contrary to the public interest depending on the nature and scope of the evidence presented by Applicant.

6. Protestant hereby requests that the application be set for oral hearing. If an oral hearing is held, protestant represents that it will appear and present evidence pertinent to the application.

7. Pursuant to Section 333(c) of the Public Utility Code (66 Pa. C.S.A. Sec. 333(c)), protestant hereby requests a list of the witnesses expected to testify in the above entitled proceeding, together with the subject matter of their anticipated testimony, and complaints, if any, or other evidence pertaining to the service of the protestant.

8. If a restrictive amendment will satisfy the interest of protestant, a proposed amendment is attached hereto as Appendix "D".

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John A. Pillar", written over a horizontal line.

JOHN A. PILLAR
Attorney for
DEBO MOVING AND STORAGE, INC.,
Protestant

Due Date: August 22, 2011

APPENDIX "A"

Re: Canterbury International, Inc., t/a
Two Men and a Truck
Docket A-2011-2251336

Applicant, Canterbury International, Inc., t/a Two Men and a Truck, has filed an application at the above docket number seeking authority as follows:

To transport household goods in use from points in the Counties of Beaver, Butler, Westmoreland, Fayette and Washington to points in Pennsylvania, and vice versa.

APPENDIX "B"

Re: Canterbury International, Inc., t/a
Two Men and a Truck
Docket A-2011-2251336

The foregoing protest to the above application is filed on behalf of:

Debo Moving and Storage, Inc.
600 Corporation Drive
Aliquippa, PA 15001

Debo Moving and Storage, Inc. holds authority from this Commission at Docket A-00106548. As pertinent to the application involved herein, Debo Moving and Storage, Inc. is authorized to transport household goods in use as follows:

between points in the borough of New Brighton, Beaver County, and within ten (10) miles by the usually traveled highways of the limits of the said borough;

from points in the borough of New Brighton, Beaver County, and within ten (10) miles by the usually traveled highways of the limits of said borough to points in Pennsylvania within forty (40) miles by the usually traveled highways of the point of origin, and vice versa;

from points in the borough of Sewickley, Allegheny County, and within six (6) miles by the usually traveled highways of the limits of said borough to points in the counties of Allegheny and Beaver within fifteen (15) miles by the usually traveled highways of the limits of the said borough; and

between points in the county of Beaver, and from points in the said county, to points in Pennsylvania, and vice versa.

Debo Moving and Storage, Inc. holds other authority which may be in conflict with that sought herein as more fully set forth in Appendix "C" attached hereto.

APPENDIX "C"

DEBO MOVING AND STORAGE, INC.

Summary of Authority

Docket A-00106548

To transport, as a Class D carrier, household goods and office furnishings in use, between points in the borough of New Brighton, Beaver County, and within ten (10) miles by the usually traveled highways of the limits of the said borough.

To transport, as a Class D carrier, household goods and office furnishings in use from points in the borough of New Brighton, Beaver County, and within ten (10) miles by the usually traveled highways of the limits of said borough to points in Pennsylvania within forty (40) miles by the usually traveled highways of the point of origin, and vice versa.

Docket A-00106548, F.I, Am-A

(1) To transport, as a Class B carrier, property, between points in the Boroughs of Emsworth, Ben Avon, Ben Avon Heights, Avalon, Bellevue, Glenfield and Sewickley, Allegheny County;

(2) To transport, as a Class C carrier, property, from points in the boroughs of Emsworth, Ben Avon, Ben Avon Heights, Avalon, Bellevue, Glenfield and Sewickley, Allegheny County, to points within twenty-five (25) miles by the usually traveled highways of the borough limits of Emsworth;

(3) To transport, as a Class D carrier, household and office furnishings, in use, from points in the boroughs of Emsworth, Ben Avon, Ben Avon Heights, Avalon, Bellevue, Glenfield and Sewickley, Allegheny County, to other points in Pennsylvania;

(4) To transport, as a Class D carrier, household goods and office furnishings, in use, between points in the county of Allegheny;

(5) To transport, as a Class D carrier, commodities for the Department of Public Assistance from its warehouses in the city of Pittsburgh, Allegheny County, to points within an airline distance of seventy-five (75) miles of the City-County Building in the city of Pittsburgh;

(6) To transport, as a Class D carrier, property, between points in the borough of Sewickley, Allegheny County, and within six (6) miles by the usually traveled highways of the limits of said borough;

(7) To transport, as a Class C carrier, property, from points in the borough of Sewickley, Allegheny County, and within six (6) miles by the usually traveled highways of the limits of said borough to points in the counties of Allegheny and Beaver within fifteen (15) miles by the usually traveled highways of the limits of the said borough;

(8) To transport, as a Class D carrier, household goods in use, contractors' equipment and trees from points in the borough of Sewickley, Allegheny County and within six (6) miles by the usually traveled highways of the limits of said borough to points in Pennsylvania within twenty-five (25) miles by the usually traveled highways of the limits of the said borough.

APPENDIX "C"

DEBO MOVING AND STORAGE, INC.

Summary of Authority (Cont'd)

Docket A-00106548, F.1, Am-B

To transport, as a Class D carrier, household goods in use, between points in the county of Beaver, and from points in the said county, to points in Pennsylvania, and vice versa.

Docket A-00106548, F.1, Am-C

To transport household goods in use:

- (1) as a Class D carrier, between points on the west side of the Allegheny River, and within ten (10) miles by the usually traveled highways of the limits of the borough of Brackenridge, Allegheny County;
- (2) as a Class D carrier, from points in the area described in the above right (Right No. 1) excluding the borough of New Kensington, to points in Pennsylvania, and vice versa.
- (3) as a Class B carrier, between points in the borough of Brackenridge, Allegheny County;
- (4) as a Class C carrier, from points in the borough of Brackenridge, to points within five (5) miles by the usually traveled highways of the limits of the said borough, and vice versa; and
- (5) as a Class B carrier, between points in the borough of Brackenridge, and within five (5) miles by the usually traveled highways of the limits of said borough;

with Rights No. 3, 4 and 5, immediately above, subject to the following conditions:

- (a) That all transportation shall originate or end in the borough of Brackenridge, Allegheny County, or within five (5) miles by the usually traveled highways of the limits of said borough;
- (b) That the transportation of household goods shall be limited and restricted to points in the borough of Brackenridge, Allegheny County, and within five (5) miles by the usually traveled highways of the limits of said borough.

Docket A-00106548, F.1, Am-D

To transport, as a Class B carrier, household goods, in use, between points in the boroughs of Sewickley, Haysville, Glen Osborne, Edgeworth and Leetsdale, Allegheny County.

To transport, as a Class D carrier, household goods, in use, from points in the boroughs of Sewickley, Haysville, Glen Osborne, Edgeworth and Leetsdale, Allegheny County, to other points in Pennsylvania.

APPENDIX "C"

DEBO MOVING AND STORAGE, INC.

Summary of Authority (Cont'd)

Docket A-00106548, F.1, Am-E

To transport, as a common carrier, household goods in use, between points in the borough of Ambridge, Beaver County, and within an airline distance of ten (10) miles thereof, including the townships of Harmony and Economy, Beaver County, and from points in said area, to points in Pennsylvania, and vice versa.

Docket A-00106548, F.1, Am-F

To transport, as a common carrier, household goods in use, between points in the county of Mercer, and from points in said county, to points in Pennsylvania, and vice versa.

APPENDIX "D"

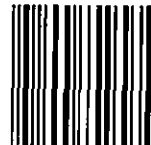
Re: Canterbury International, Inc., t/a
Two Men and a Truck
Docket A-2011-2251336

Protestant, Debo Moving and Storage, Inc., knows of no restrictive amendment that would satisfy its interest at this time.

John A. Piller
Attorney at Law
265 Marion Drive
Pittsburgh, PA 15228



1000



17105

U.S. POSTAGE
PAID
PITTSBURGH, PA
15234
AUG 16, 11
AMOUNT

\$1.28
00046802-1

Hon. Rosemary Chiavetta, Secretary
Penna. Public Utility Commission
P.O. Box 3265
Harrisburg, Pa 17105-3265