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

August 16, 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:

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ECRETARY'S BURFALL

Enclosed is a protest filed on behalf of The Snyder Brothers Moving, Inc., t/d/b/a George Transportation Company, 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

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Enclosure

cc: Canterbury International, Inc.

t/a Two Men and a Truck

3555 Valley Drive Pittsburgh, PA 15234

George Transportation Company

Before the PENNSYLVANIA PUBLIC UTILITY COMMISSION

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 <u>Pennsylvania Bulletin</u> 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,

Attorney for

THE SNYDER BROTHERS MOVING, INC.,

t/d/b/a GEORGE TRANSPORTATION

COMPANY, 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:

The Snyder Brothers Moving, Inc., t/d/b/a George Transportation Company P. O. Box 1823
Cranberry Township, PA 16066-1823

The Snyder Brothers Moving, Inc., t/d/b/a George Transportation Company, holds authority from this Commission at Docket No. A-86452. As pertinent to the application involved herein, George Transportation Company is authorized to transport household goods in use as follows:

from points in Butler County to points in Pennsylvania, and vice versa;

between points in ButlerCounty;

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from points in the Boroughs of Monaca, Rochester, Freedom, Beaver and West Bridgewater, and the Townships of Center and Potter, Beaver County, to other points in the County of Beaver, and vice versa:

between points in the City of Monongahela, Washington County, and within five (5) miles by the usually traveled highways of said city;

between points in the Borough of Donora, Washington County, and within three (3) miles of the limits of said borough;

from points in the Borough of Donora, Washington County, and within fifteen (15) miles by the usually traveled highways of the limits of said borough, to other points in Pennsylvania, and vice versa:

from points in the City of Monongahela, Washington County, and within an airline distance of five (5) miles of the limits of the city hall in the City of Monongahela, to points within an airline distance of twenty-five (25) miles of the city hall in the City of Monongahela, and vice versa.

George Transportation Company holds other authority which may be in conflict with that sought herein as more fully set forth on Appendix "C" attached hereto.

APPENDIX "C"

THE SNYDER BROTHERS MOVING, INC., t/d/b/a GEORGE TRANSPORTATION COMPANY

Summary of Authority

Docket A-86452, Folder 2

To transport, as a Class D carrier, household goods and office furniture in use between points in the Borough of McKees Rocks, Allegheny County, and within twenty-five (25) miles by the usually traveled highways of the limits of the said borough. (Formerly A.69934, F.2.)

To transport, as a Class D carrier, new furniture, fixtures, and household appliances, and new office furniture, fixtures and office appliances for Superior Furniture Company from points in the Borough of McKees Rocks, Allegheny County, to points in the County of Allegheny, and vice versa. (Formerly A.69934, F.3.)

Docket A-86452, F.2, Am-A

To transport, as a Class D carrier, by motor vehicle, household goods, personal effects and property used or to be used in a dwelling when a part of the equipment or supplies of such dwelling, as an incidental part of a removal by the householder from one domicile to another; furniture, fixtures, equipment and the property of stores, offices, museums, institutions, laboratories, hospitals or other establishments, when a part of the stock, equipment or supply of such stores, offices, museums, institutions, laboratories, hospitals or other establishments, in connection with a removal from one location to another; and articles, in use, including objects of art, displays and exhibits which, because of their unusual nature or value require specialized handling and equipment usually employed in moving household goods, from points in the County of Butler to points in Pennsylvania, and vice versa.

Docket A-86452, F.2, Am-B

- 1. To transport, as a Class B carrier, household goods and office furniture in use, between points in the City of Pittsburgh, Allegheny County, and within five (5) miles, by the usually traveled highways of the limits of said City.
- 2. To transport, as a Class D carrier, household goods and office furniture and fixtures in use from points in the City of Pittsburgh, Allegheny County, and within five (5) miles by the usually traveled highways of the limits of said City to points in Pennsylvania, and vice versa.
- 3. To transport, as a Class D carrier, new and used household goods, appliances, and store fixtures between points in the City of Pittsburgh, Allegheny County, and within an airline distance of fifteen (15) statute miles thereof, and from points in said area to points within an airline distance of fifty (50) statute miles of the City-County Building, Pittsburgh, and vice versa.

THE SNYDER BROTHERS MOVING, INC., t/d/b/a GEORGE TRANSPORTATION COMPANY

Summary of Authority (Cont'd)

Docket A-86452, F.2, Am-C

To transport, as a Class D carrier, tabulating machines, calculating machines, computers, copying machines, electronic equipment and other business machines and equipment, which because of their unusual nature or value, require specialized handling and equipment usually employed in moving household goods, and parts, materials and supplies used in connection therewith, (1) between points in the Borough of McKees Rocks, Allegheny County, and within twenty-five (25) miles by the usually traveled highways of the said Borough; (2) between points in the City of Pittsburgh, Allegheny County, and within five (5) miles by the usually traveled highways of the limits of the said city; (3) between points in the City of Pittsburgh, Allegheny County, and within an airline distance of fifteen (15) statute miles thereof, and from points in the said territory to points within an airline distance of fifty (50) statute miles of the City-County Building in the City of Pittsburgh, Allegheny County, and vice versa; and (4) from points in the County of Butler, to points in Pennsylvania, and vice versa.

Docket A-86452, F.2, Am-D

To transport, as a Class D carrier, household goods in use, between points in the City of Franklin, Venango County, and points within twenty-five (25) miles by the usually traveled highways of the limits of said City, and from points in the said territory to other points in Pennsylvania.

Docket A-86452, F.2, Am-E

To transport, as a Class D carrier, household goods in use, from points in the Boroughs of Monaca, Rochester, Freedom, Beaver and West Bridgewater, and the Townships of Center and Potter, Beaver County, to other points in the County of Beaver, and vice versa.

Docket A-86452, F.2, Am-F

To transport household goods in use:

- (1) between points in the borough of New Bethlehem, Clarion County, and within ten (10) miles by the usually traveled highways of the limits of said borough;
- (2) from points in the borough of New Bethlehem, Clarion County, and within ten (10) miles by the usually traveled highways of the limits of said Borough, to points in Pennsylvania, and vice versa.

Docket A-86452, F.2, Am-G

To transport, as a Class D carrier:

- (1) household goods in use between points in the City of Altoona, Blair County, and within ten (10) miles by the usually traveled highways of the limits of the said City.
- (2) household goods in use from points in the City of Altoona, Blair County, and within ten (10) miles by the usually traveled highways of the limits of said City, to other points in Pennsylvania, and vice versa.

THE SNYDER BROTHERS MOVING, INC., t/d/b/a GEORGE TRANSPORTATION COMPANY

Summary of Authority (Cont'd)

Docket A-86452, F.2, Am-H

To transport, as a common carrier, by motor vehicle, household goods in use, between points in the County of Butler.

Docket A-86452, F.2, Am-I

To transport, as a common carrier, household goods in use:

- (1) as a Class B carrier, between points in the City of Monongahela, Washington County, and within five (5) miles by the usually traveled highways of said city;
- (2) as a Class B carrier, between points in the Borough of Donora, Washington County, and within three (3) miles of the limits of said borough;
- (3) as a Class D carrier, from points in the Borough of Donora, Washington County, and within fifteen (15) miles by the usually traveled highways of the limits of said borough, to other points in Pennsylvania, and vice versa;
- (4) as a Class D carrier, from points in the City of Monongahela, Washington County, and within an airline distance of five (5) miles of the limits of the city hall in the City of Monongahela, to points within an airline distance of twenty-five (25) miles of the city hall in the City of Monongahela, and vice versa.

APPENDIX "D"

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

Protestant, The Snyder Brothers Moving, Inc., t/d/b/a George Transportation Company, knows of no restrictive amendment that would satisfy its interest at this time.

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SECRETARY'S BUREAU

John A. Pillar **Attorney** at Law



Hon. Rosemary Chiavetta, Secretary Pa Public Utility Commission P.O. Bux 3265

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