

RAWLE & HENDERSON LLP



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December 23, 2011

VIA HAND DELIVERY

Rosemary Chiavertta
Secretary's Bureau
Pennsylvania Public Utility Commission
Keystone Building
Second Floor
Harrisburg, PA 17105-3265

RECEIVED
2011 DEC 23 PM 12:42
PA PUC
SECRETARY'S BUREAU

RE: Application of Modern Motor Coach, Inc. d/b/a Modern Piano Moving
Docket No: A-2010-2155021
Certificate No: A-8911738
Our File No: 250,688

Dear Ms. Chiavertta:

On behalf of Modern Motor Coach, Inc. d/b/a Modern Piano Moving, we respectfully request a 60 day extension to file the tariff and insurance information.

A tariff has already been submitted to the Tariff Section. However, we were advised that it does not meet the requirements of 52 Pa. Code 31.121. Due to the unique nature of moving pianos and organs, Modern Piano Moving does not charge hourly rates. As such, we shall be filing a Petition for Waiver of 52 Pa. Code 31.121. As such, we are requesting an extension for the filing of the tariff and insurance while our Petition for Waiver is pending.

Thank you for your assistance in this matter. We look forward to hearing from you.

Very truly yours,

RAWLE & HENDERSON LLP

By:

Diane B. Carvell

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December 23, 2011

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DBC/dbc

cc: Deidre Farley (fax: 717-787-3114)

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RE: Application of Modern Motor Coach, Inc. d/b/a Modern Piano Moving
Docket No: A-2010-2155021
Certificate No: A-8911738
Our File No: 250,688

To Whom It May Concern:

On behalf of Modern Motor Coach, Inc. d/b/a Modern Piano Moving, we respectfully submit this Petition for Waiver of 52 Pa. Code. 31.121.

Under 52 Pa. Code 31.121, the charge for moves that are less than 40 miles are based on an hourly rate. If the move is over 40 miles, the charge is based on weight and mileage.

Modern Motor Coach, Inc. d/b/a Modern Piano Moving's authority is "to transport, as a common carrier, by motor vehicle, household goods in use, limited to pianos and organs, between points in Pennsylvania."

As explained previously, Modern Piano Moving is the largest dedicated piano mover in the country. It provides the unique service of only moving pianos and organs. Likewise, the process of moving pianos and organs is unique. Unlike regular household goods such as books, pots and pans, piano and organs are not simply thrown in a box and placed on a truck.

The process of moving pianos and organs can be very complicated. Each move is unique based upon the size and type of piano or organ and the location of the pick-up or delivery site. Due to the size and shape of pianos and organs, negotiating steps and turns can be extremely difficult. In addition, on many occasions, special equipment is used, such as ATV's and cranes, to facilitate the safe move of the piano and organ without damaging the object or the customer's property.

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As a result, Modern Piano Moving has a very detailed formula for pricing each move. This formula takes into account the size and type of piano or organ, the number of steps and turns that must be negotiated, the mileage between the two points, and the costs of extra equipment or labor. A copy of the proposed tariff is enclosed for your review.

This formula is used for all interstate moves and for all intrastate moves in every other state. If Modern Piano Moving was required to use a flat hourly rate or strictly use a mileage and weight rate for Pennsylvania intrastate moves, the other factors that must be considered or equipment used would not be considered. As such, Modern Piano Moving would be forced to set an exorbitant hourly or weight rate to cover the complicated moves. This would not be fair to the customers who have less complicated moves. It would also not allow for discounts for moves that have open pick-up and delivery dates.

In addition, Modern Piano Moving cannot predict how long each will take. Each move is unique and the amount of time required for each move cannot be properly estimated until the movers arrive at each location and assess the situation. While Modern Piano Moving works with its customers in advance to anticipate any difficulties, i.e., turns, tight staircases, etc., the length of time for an actual pick up or delivery can vary with each move.

Modern Piano Moving prides itself on moving pianos in a safe and professional manner, taking great care of the cherished instruments of their customers and their surrounding property. Its employees are specially trained to move pianos and organs very carefully. The pricing formula normally used by Modern Piano Moving takes into consideration all of the necessary elements to ensure a safe and damage-free move for their customers.

As such, Modern Motor Coach, d/b/a Modern Piano Moving, respectfully requests a waiver of 52 Pa. Code 31.121.

Very truly yours,

RAWLE & HENDERSON LLP

By:



Diane B. Carvell

DBC/dbc

cc: Deidre Farley (fax: 717-787-3114)

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Certificate No: A-8911738

(Freight) Pa.P.U.C. No. 1

Modern Motor Coach, Inc. d/b/a/ Modern Piano Moving

Schedule of Minimum Rates and Charges

**To transport, as a common carrier, by motor vehicle, household goods
in use, limited to pianos and organs, between points in Pennsylvania**

Issued: December 22, 2011

Effective: December 23, 2011

Issued under authority of 52 Pa. Code Section 23.145

**By: Modern Motor Coach, Inc. d/b/a/ Modern Piano Moving
Russell Vitt, President and General Manager
992 Highway D
Sullivan, MO 63080
800-737-5600
314-568-6887 (cell)**

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RULES AND REGULATIONS

Any provisions which affect application of the rates or fares being established. Regulations governing packing of goods, payment of invoices, application of bus ticket fares, etc. must be included.

SCHEDULE OF RATES

The calculation for pricing is as follows:

Total Cost = Move Costs + Miles Cost + Steps & Turns Cost + Valuation + Extras

The minimum charge is \$500.

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MOVE COSTS

Move Costs = Piano Type Cost x 5 x Timing Cost

Piano Type Cost Chart

<u>Size or Type</u>	<u>Regular</u>	<u>Player</u>
Small – 39” or less	\$ 48.00	\$ 57.60
Medium – 40” – 48”	\$ 60.00	\$ 72.00
Large – 49” – 55”	\$ 72.00	\$ 86.40
Upright Grand	\$ 78.00	\$ 93.60
4’1” – 5’0” Grand	\$ 78.00	\$ 93.60
5’1” – 6’0” Grand	\$ 84.00	\$100.80
6’1” – 7’0” Grand	\$ 96.00	\$115.20
Square Grand	\$ 96.00	\$115.20
7’1” – 8’0” Grand	\$120.00	\$144.00
8’1” – 9’0” Grand	\$144.00	\$172.80
9’1” – 10’0” Grand	\$168.00	\$201.60
Small Organ	\$ 48.00	\$ 57.60
Large Organ	\$ 60.00	\$ 72.00
Small Church Organ	\$ 90.00	\$108.00
Large Church Organ	\$144.00	\$172.80
Harpsichord	\$ 72.00	\$ 86.40

Timing Costs

If expedited move, move costs are multiplied by 4. Expedited moves are pick-up within 2 weeks and deliver the same or next day.

If open move, move costs are multiplied by 0.75. Open moves are open to pick-up and delivery timing.

If regular move, no multiplier is used. Regular moves have a 30 day pick-up and then a 30 day delivery window.

MILES COST

Miles Costs = Baseline Miles + Off-Route Miles

Baseline Miles = Number of Miles between Pick-up and Delivery x 2

Off-Route Mile = Number of Miles greater than 10 off interstate x 3

STEPS & TURNS COST

Steps & Turns Costs =(Number of Steps x Steps Costs) + (Number of Turns x Turn Cost)

Steps & Turns Cost Chart

<u>Size or Type</u>	<u>Steps Cost</u>	<u>Turns Cost</u>
Small – 39” or less	\$ 4.00	\$ 20.00
Medium – 40” – 48”	\$ 6.00	\$ 30.00
Large – 49” – 55”	\$ 8.00	\$ 40.00
Upright Grand	\$ 12.00	\$ 60.00
4’1” – 5’0” Grand	\$ 6.00	\$ 40.00
5’1” – 6’0” Grand	\$ 8.00	\$ 50.00
6’1” – 7’0” Grand	\$ 12.00	\$ 60.00
Square Grand	\$ 12.00	\$ 60.00
7’1” – 8’0” Grand	\$ 14.00	\$ 70.00
8’1” – 9’0” Grand	\$ 16.00	\$ 80.00
9’1” – 10’0” Grand	\$ 24.00	\$120.00
Small Organ	\$ 4.00	\$ 20.00
Large Organ	\$ 6.00	\$ 30.00
Small Church Organ	\$ 8.00	\$ 40.00
Large Church Organ	\$ 16.00	\$ 80.00
Harpichord	\$ 4.00	\$ 20.00

VALUATION

Included in the move cost, at no additional charge, is \$1,500 of insurance coverage for damage to the item moved. Additional coverage is available at \$5 per \$1,000 of coverage added.

EXTRAS

Extras are additional services to complete job.

Use of ATV = \$100.00

Use of ATV with trailer = \$150.00

Rental Truck = \$200.00

Extra Labor = \$100.00 per person

Crane = cost plus cost of 2 turns (see Steps & Turns Cost Chart)

Extra Items (i.e. organ speakers) = \$100.00 per hour + \$1.00 per pound (\$20.00 per item minimum)

Long or Lawn Carry = the greater of the cost of steps & turns if they exist or \$80.00

Storage = \$75.00 per month plus one time \$75.00 warehouse handling plus the move cost

Waiting Time (Customer not home when confirmed) = \$100 per hour