

WGM Transportation, Inc.

9074 Franklin Hill Road  
East Stroudsburg, PA 18301  
570-223-9289  
PUCA00111651

October 4, 2012

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

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dear Secretary Chiavetta,

*C-2012-2323843*

Enclosed herewith please find the Original Answer, New Matter and check in the amount of \$3,200.00, along with three (3) copies of same.

Thank you for your attention to this matter.

Very truly yours,

*Wayne G. Martin, Jr.*

WAYNE G. MARTIN, JR.  
President, WGM Transportation, Inc.  
Certified First Class Postal Mail

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :  
Bureau of Investigation and Enforcement :  
v. : Docket No. C-2012-2323843  
WGM Transportation, Inc., :

**ANSWER TO COMMISSIONS COMPLAINT**

NOW COMES, WGM Transportation, Inc., (“Respondent”) by and through it’s President, Wayne G. Martin, Jr. and respectfully files the following Answer to the Complaint filed by the Pennsylvania Public Utility Commission’s (“Commission”), Bureau of Investigation and Enforcement (“I&E”), and respectfully answer the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.

**Factual Background**

12. Admitted.
13. Admitted.

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**PA PUBLIC UTILITY COMMISSION  
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14. Admitted.

15. Admitted.

16. Admitted in Part. Denied in Part. It is admitted that at this date Respondent still owes this Honorable Commission the amount of \$3,200.00. It is specifically denied that Respondent did not make any effort to pay on the 2011 Assessments in the amount of \$4,878.00. The total amount that Respondent owed from the previous years when all the "Appeals" with the Assessments were completed was \$12,631.00. The Respondent faithfully made monthly payments to This Honorable Commission bringing that balance owed down to \$2,900.00 at the time the new were received in the amount of \$4878.00. Thus, bringing the balance back up to \$7,778.00.

**Violation**

17. Admitted in Part. Denied in Part. It is admitted that a balance in the amount of \$3,200.00 is due and owing at this date, however it is specifically denied that Respondent did not ignore or not attempt to make payments as explained in Paragraph 16, above. Respondent is enclosing a check in the amount of \$3,200.00 to cover the full amount due for the current and "old" assessments due and owing to date.

**NEW MATTER**

18. Respondent, WGM Transportation, Inc., made payments for the reason that business has been decreasing due to the economy. Respondent has not asked for or has obtained a rate increase in many years for this reason. However, with that in mind all of Respondents expenses have increased: i.e., insurance, maintenance fees, assessment fees and numerous other expenses. Respondent has had to make adjustments due to the

economy within the local area such as:

- (a) Deleted cars off of our fleet as evidenced by our fleet registration.
- (b) Deleted cars off of our fleet to lessen our high insurance payments.
- (c) Deleted cars off of our fleet to be able to insure that all of our

operating vehicles continue to be in the best of working order as evidenced by our maintenance and safety inspection record with This Honorable Commission over the past 19 years.

- (d) Officers are working and NOT taking any salaries at this time.

19. Respondent through it's President is answering this Complaint by This Honorable Commission to save the cost of Attorney Fees which could total as much as \$1,000.00 or more.

**WHEREFORE**, for all the foregoing reasons, Respondent, WGM

Transportation, Inc., respectfully requests that:

- (a) Respondent received Complaint by way of Certified Postal Mail on September 20<sup>th</sup>, 2012.
- (b) This Honorable Commission accept the payment in full for the outstanding balance of \$3,200.00 enclosed herein;
- (c) This Honorable Commission not cancel Respondents Certificate of Public Convenience;
- (d) This Honorable Commission not revoke or suspend Respondents automobile registrations;
- (e) This Honorable Commission not refer this matter to the Pennsylvania Office of Attorney General; and
- (f) This Honorable Commission not charge Respondent the civil penalty in the amount of \$480.00 as these monies could be used elsewhere.

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**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

Respectfully submitted,

*Wayne G. Martin, Jr.*

Wayne G. Martin, Jr.

President

WGM Transportation, Inc.

9074 Franklin Hill Road  
East Stroudsburg, PA 18301

Dated: October 4, 2012

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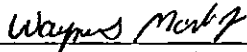
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**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

**VERIFICATION**

I, Wayne G. Martin, Jr., President of WGM Transportation, Inc., (Respondent) hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. 4904 relating to unsworn falsification to authorities.

Date: October 4<sup>th</sup>, 2012

  
\_\_\_\_\_  
Wayne G. Martin, Jr.  
President  
WGM Transportation, Inc.  
9074 Franklin Hill Road  
East Stroudsburg, PA 18301

## CERTIFICATE OF SERVICE

I, Wayne G. Martin, Jr., do hereby certify that I have this day served a true copy of the foregoing Answer to the Complaint served by the Bureau of Investigation and Enforcement/Pennsylvania Public Utility Commission and New Matter upon the parties, listed below, in accordance with the requirements of 52 Pa. Code 1.54 (relating to service by a party).

Notification by First Class Certified Mail:

Original, three copies and payment to:  
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265


And

Wayne T. Scott  
First Deputy Chief Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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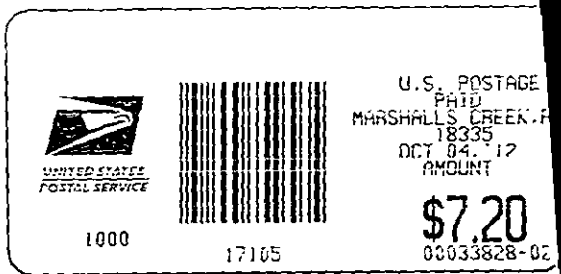
**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

  
\_\_\_\_\_  
Wayne G. Martin, Jr.  
President  
WGM Transportation, Inc.

9074 Franklin Hill Road  
East Stroudsburg, PA 18301

Dated: October 4<sup>th</sup>, 2012

WGM Transportation  
9074 Franklin Hill Rd.  
East Stroudsburg, PA 18301



Rosemary Chiavetta, Secretary  
PUC  
P.O. Box 3265  
Harrisburg PA. 17105-3265