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MOSES K. ROSENBERG  
ARTHUR L. BERGER  
FRANCIS B. HAAS, JR.  
G. THOMAS MILLER  
DONALD R. WASEL  
RICHARD R. LEFEVER  
J. THOMAS MENAKER  
CLYDE W. MCINTYRE  
S. BERNE SMITH  
ROD J. PERA  
EDWARD W. ROTHMAN  
ROBERT A. MILLS  
W. JEFFRY JAMOUNEAU  
HERBERT R. NURICK  
DAVID E. LEHMAN  
NORMAN I. WHITE  
F. MURRAY BRYAN  
RICHARD W. STEVENSON  
WILLIAM A. CHEBNUTT  
HENRY R. MACNICHOLAS  
WILLIAM M. YOUNG, JR.  
ROBERT M. CHERRY  
DAVID B. DISNEY  
H. LEE ROUSSEL  
MAURICE A. FRATER  
C. GRAINGER BOWMAN

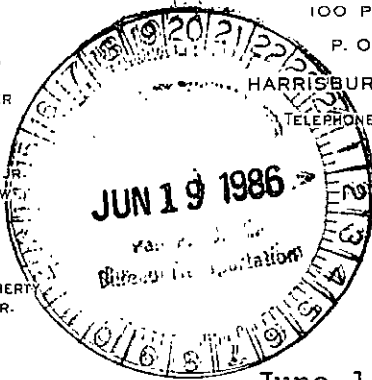
JOHN S. OYLER  
DELANO M. LANTZ  
HARVEY FREEDENBERG  
EDWARD J. RIEHL  
JASON S. SHAPIRO  
ERIC L. BROSSMAN  
ROBERT D. STETS  
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MARY JANE FORBES  
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ALAN R. BOYNTON, JR.  
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HARRISBURG, PA. 17108-1166

TELEPHONE (717) 232-8000



June 19, 1986

STERLING G. MCNEES  
1923-1959

DAVID M. WALLACE  
1942-1967

RETIRED PARTNERS

HARRY H. FRANK  
JAMES H. BOOSER  
JAMES W. HAGAR  
JAMES H. KING

OF COUNSEL

GILBERT NURICK  
EDWARD C. FIRST, JR.  
ROBERT H. GRISWOLD  
JEFFERSON C. BARNHART  
SAMUEL A. SCHRECKENGAUST, JR.

In re: Towaway Express, Inc.  
A-00106208

RECEIVED

JUN 19 1986

SECRETARY'S OFFICE  
Public Utility Commission

Jerry Rich, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17120

Dear Mr. Rich:

On behalf of the applicant, in the above-captioned proceeding, we have enclosed, for filing, the original and two copies of the statement of case and verified statements of facts in support of the application.

If there are any questions concerning the statements, please contact the undersigned.

Very truly yours,

MCNEES, WALLACE & NURICK

By

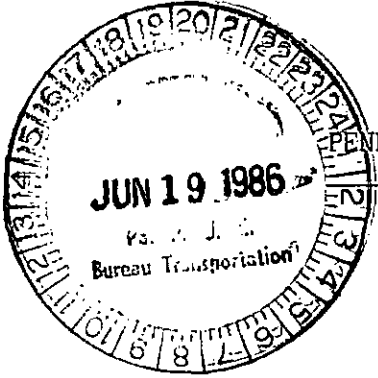
*Herbert R. Nurick*  
Herbert R. Nurick

HRN/jh

Enclosure

cc: Mr. Thomas S. Sheaffer w/enclosure  
Mr. Evert R. Hawk





BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**RECEIVED**

In re:

JUN 19 1986

APPLICATION OF

SECRETARY'S OFFICE  
Public Utility Commission

TOWAWAY EXPRESS, INC.  
A-00106208

STATEMENT OF CASE AND  
VERIFIED STATEMENTS OF FACTS  
SUBMITTED ON BEHALF OF  
TOWAWAY EXPRESS, INC., APPLICANT

Herbert R. Nurick, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
Harrisburg, PA 17108-1166  
(717) 232-8000

Attorneys for Applicant

Due: June 20, 1986

**DOCUMENT  
FOLDER**

**DOCKETED**  
APPLICATION DOCKET  
JUN 20 1986  
ENTRY No. *MS*

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF

TOWAWAY EXPRESS, INC.  
A-00106208

---

STATEMENT OF CASE

COMES NOW Towaway Express, Inc., and files its statement of case and verified statements of facts in support of the above captioned application.

Applicant filed an application with the Pennsylvania Public Utility Commission seeking the following authority:

To transport (1) trailers (excluding mobile homes), trailer chassis, trailer converter dollies, and containers, and (2) materials, equipment, parts, and supplies used in the manufacture, assembly, servicing, distribution, and sale of the commodities named in (1) above, between points in Pennsylvania.

Publication of notice of the application appeared in the Pennsylvania Bulletin of Saturday, May 18, 1985, at page 1183. The following carriers filed protests to the application: Morgan Drive Away, Inc. ("Morgan"), ~~Trailer Transit, Inc. ("Trailer Transit"), and C. L. Feather, Inc. ("Feather").~~

Applicant filed a restrictive amendment dated March 7, 1986. Following the filing of that amendment, the protests of Morgan and Feather were withdrawn. Applicant filed a revised restrictive amendment, dated March 21, 1986 and, based on that amendment, the protest of Trailer Transit was

withdrawn. Therefore, this proceeding became unopposed and was referred to the Bureau of Transportation for review and report to the Commission. A copy of the amendment dated March 21, 1986 is attached to the verified statement of Thomas S. Sheaffer, as Appendix "A."

Verified statements are due on or before June 20, 1986.

Attached hereto are the verified statements of the following persons:

1. Thomas S. Sheaffer, president of applicant.
2. Leon T. Milnor, corporate traffic manager of Strick Corp.
3. James K. Brown, director, traffic and transportation, of Fruehauf Corporation.
4. Timothy William Rhoads, branch manager of Great Dane Lancaster, Inc.
5. Frank W. Springer, manager of traffic of Thayco Trailer Corp.
6. David Shinn, fleet scheduling supervisor of Hertz-Penske Truck Leasing, Inc.
7. Edward E. Paulin, general manager of West Point Trailer Supply.
8. Tanya Rogers, plant accountant of The Heil Co.
9. Kenneth W. Haben, of Cobra Mfg. Inc.
10. Leonard W. Miller, sales coordinator of Dorsey Trailers, Inc.

We submit that the evidence in this case demonstrates that there is a need for the applicant's proposed service throughout the state of Pennsylvania, as modified in the revised restrictive amendment. We further submit that the evidence demonstrates that approval of the application, as amended, is necessary and proper for the service, accommodation, convenience, and

safety of the public. Therefore, we respectfully request that the application, as amended, be approved in its entirety.

Respectfully submitted,  
TOWAWAY EXPRESS, INC.

By *Herbert R. Nurick*  
Herbert R. Nurick, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
Harrisburg, PA 17108-1166

Attorneys for Applicant

Dated: June 18, 1986

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

---

In re:

APPLICATION OF

TOWAWAY EXPRESS, INC.  
A-00106208

---

STATEMENT OF THOMAS S. SHEAFFER

I. LEGAL NAME AND DOMICILE OF APPLICANT

The legal name of the applicant is Towaway Express, Inc. ("applicant"). Applicant's address is 6780 Carlisle Pike, Mechanicsburg, Pennsylvania 17055. Applicant is domiciled in Silver Spring Township, Cumberland County, Pennsylvania.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR APPLICANT

My name is Thomas S. Sheaffer, and my business address is the same as set forth part I of this statement. Applicant was incorporated as a Pennsylvania corporation on January 16, 1985, and I have been president of the applicant since its incorporation. I am completely familiar with applicant's authority, operations, facilities, equipment, and personnel. Moreover, I am also thoroughly familiar with the present application, and I am authorized by my corporation to submit this testimony in support of the application.

Prior to becoming employed with the applicant, I was general manager of the Towaway Division of Morgan Drive Away, Inc. ("Morgan"), which

performs service similar to that which applicant seeks in this application. I was with Morgan for approximately three years and, prior to that time, I was general manager, Special Commodities Division, of Arco Auto Carriers, Inc. which also dealt in transportation of the commodities which the applicant seeks to transport in the instant proceeding. I held that position with Arco for approximately 12 years. In view of my background, I am quite knowledgeable of the type of transportation which the applicant seeks to perform through approval of this application.

III. IS THE APPLICANT AFFILIATED WITH OTHER CARRIERS?

Applicant is not affiliated with any other carriers.

IV. AUTHORITY SOUGHT

As initially filed, applicant sought authority to transport (1) trailers (excluding mobile homes), trailer chassis, trailer converter dollies, and containers, and (2) materials, equipment, parts, and supplies used in the manufacture, assembly, servicing, distribution, and sale of the commodities named in (1) above, between points in Pennsylvania. As amended, applicant seeks the authority set forth in the "Revised Restrictive Amendment," dated March 21, 1986, attached hereto as Appendix "A."

V. GENERAL SCOPE OF CURRENTLY AUTHORIZED OPERATIONS

Applicant holds authority with the Interstate Commerce Commission, at Docket No. MC-181480, as follows:

To operate as a common carrier, by motor vehicle, in interstate or foreign commerce, over irregular routes, transporting trans-

portation equipment, between points in the United States (except Alaska and Hawaii).

On May 22, 1986, the Pennsylvania Public Utility Commission ("Commission") adopted and entered its order granting applicant the following emergency temporary authority at Docket No. A-00106208:

To transport, as a Class D carrier, trailers (excluding mobile homes, travel trailers and office trailers), trailer chassis, trailer converter dollies and containers, leased by McDonnell Douglas Finance Corporation to Hall's Motor Transit Company, for the account of Chicago Fleet Liquidators, from points in Pennsylvania, to the facilities of Dupes' Garage, Londonderry Township, Dauphin County.

On June 12, 1986, the Commission adopted and entered its order granting applicant the following additional emergency temporary authority at Docket No. A-00106208, F. 600:

To transport, as a common carrier, trailers, from the facilities of Thayco Trailer Corp., located in the township of Upper Uwchlan, Chester County, to the facilities of Carolina Freight Carriers Corp., located in Middlesex Township, Cumberland County.

Applicant does not presently hold any permanent authority with the Commission.

#### VI. DUPLICATING AUTHORITY WHICH WILL RESULT FROM GRANT OF AUTHORITY

Inasmuch as the applicant does not hold any permanent authority with the Commission, approval of this application will not result in duplicating authority.

VII. DUAL OPERATIONS RESULTING FROM GRANT OF AUTHORITY

Applicant is seeking common carrier rights in this proceeding. Since applicant does not hold, or seek, contract carrier rights from the Commission, there will be no dual operations resulting from the grant of the authority.

VIII. PERTINENT TERMINAL FACILITIES AND COMMUNICATIONS NETWORK

Applicant's facilities are located in Silver Spring Township, Cumberland County, Pennsylvania, on approximately one and one-half acres of land. At these facilities, applicant has a building containing 2,100 square feet in which there is included an office, parking for vehicles, drivers' lounge, and central dispatch room.

Applicant has a WATS line for long distance calls both outgoing and incoming as well as 2 regular lines for calls. Of course, long distance calls can be made also on the regular phone lines.

IX. PERTINENT EQUIPMENT

A list showing the equipment operated by the applicant is attached hereto as Appendix "B." This list shows that applicant operates 38 tractors. All of these are on long-term lease. Included are 13 single-axle tractors and 25 tandem-axle tractors.

Applicant utilizes "jiff-lox" in connection with its service. "Jiff-lox" are devices which are hooked onto the end of trailers being towed so that a second trailer can also be towed. Transporting two trailers at one time is a most desirable feature for shippers of the commodities which the

applicant seeks to transport because it allows for the most economic and efficient transportation for the shipper.

The equipment operated by the applicant is the type of equipment required by shippers of the commodities which applicant seeks to transport in the present proceeding.

Applicant also can lease flatbed trailers to transport converter dollies and containers. Most times, containers move on top of a trailer chassis being transported. Concerning the commodities set forth in part (2) of the application, they often move along with the trailer being transported. When this is not the case, they move in or on trailers supplied by the shipper or leased trailers. Converter dollies also are transported in or on such trailers, as well as individually. Applicant will lease trailers when necessary.

#### X. SAFETY PROGRAM

Applicant has a very systematic safety program which is supervised by a safety director. Before a tractor is leased by applicant, applicant conducts checks with previous employers of the drivers. Moreover, applicant will not use any driver under the age of 25 or with less than three years' experience. Applicant also makes periodic checks through the DAC computer system for motor vehicle record reports to make sure that the drivers which it uses do not have any driving problems.

Turning to equipment, the equipment is thoroughly inspected by applicant's personnel prior to its being leased. The drivers inspect the

equipment daily and logs are kept with regard to maintenance and inspection of the equipment. Applicant conducts spot road checks on the equipment. Any repairs required are performed by qualified mechanics, and there is routine maintenance of the equipment by qualified mechanics.

Safety fliers are distributed to the drivers throughout the year, and applicant has a safety incentive program which gives rewards for safe driving.

In all, safety is a top concern of applicant, and applicant does everything it can to insure a safe operation.

#### XI. TYPE OF SERVICE CURRENTLY PROVIDED TO THE SUPPORTING WITNESSES

Concerning permanent-authority operations, applicant performs service for supporting shippers in interstate commerce. It gives those shippers the kind of equipment they require as well as the type of service they require. For example, when two trailers are to be transported at one time, applicant provides that service. It also provides expedited pickups and deliveries and gives the expertise required to perform the specialized type of transportation involved in this application.

#### XII. TYPE OF SERVICE TO BE OFFERED

The applicant will offer shippers single-axle tractors as well as tandem-axle tractors as required. For that portion of the operation which is not towaway, the applicant will utilize trailers owned by the shippers or will lease trailers to perform the service. Of course, when the commodities covered by part (2) of the application are sent with trailers, those

commodities will be transported on the trailer which is also being transported. With regard to transporting two trailers on one trip, applicant will do so through use of its "jiff lox" equipment.

Applicant will provide prompt service to its customers including prompt pickups and deliveries. Applicant will be able to make pickups within 24 hours of the time of request as well as deliveries within 24 hours from the time of pickup when that service is required. When requested, applicant will make pickups the same days the trailers become available for transportation.

In all, the applicant will provide the shippers with the same type of service it provides to its shippers in interstate commerce except that some trips in interstate commerce cannot be effected in 24 hours due to the distance involved.

#### XIII. FINANCIAL DATA

The balance sheet of applicant as of April 30, 1986, and the income statement of applicant taken at April 30, 1986, are included in Appendix "C" attached hereto. A review of these documents will show that applicant is operating at a profit and has healthy retained earnings.

#### XIV. WHETHER SERVICE PROVIDED WILL CREATE EMPTY MILES OR BACKHAULS

Approval of this application will allow applicant to make two-way moves. Additionally, these moves will coordinate quite well with applicant's interstate operation. Instead of approval of the application creating empty miles, approval will enable applicant to obtain backhauls and

operate with less empty miles than it does currently. Approval will allow the applicant to operate more economically and efficiently and make the most productive use of its equipment.

Applicant has studied its proposed operation very carefully and is quite satisfied that not only is it feasible, but it is also imperative for applicant to have in order to conduct the most efficient and economical operation.

XV. ANY OTHER INFORMATION DEEMED PERTINENT

Applicant has five full-time employees in addition to the 38 drivers utilized by it for the long-term leased tractors. It has experienced and competent personnel who will be able to provide the transportation service required.

Applicant has been requested to perform this service. The type of transportation which applicant seeks to perform is unique in that it can consist of spot moves between any two points in the Commonwealth of Pennsylvania at any time, as well as concentrated moves to be completed within a short period of time. This is evidenced by the emergency temporary authority which applicant had to obtain in order to perform a particular service at a given time. Applicant is able to handle the transportation required, and I repeat that it involves service, at any given time, between any two points in Pennsylvania.

Applicant has sufficient facilities, equipment of the proper kind, and personnel to handle the traffic which will be tendered to it under the

authority being sought in this proceeding. Applicant is ready, willing, and able to perform the service requested. Applicant is also ready, willing, and able to obtain additional equipment, facilities, and personnel if necessary.

For the reasons set forth above and in the supporting shipper statements, I respectfully request that the Commission approve the instant application, as amended, in its entirety.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF

TOWAWAY EXPRESS, INC.  
A-00106208

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REVISED RESTRICTIVE AMENDMENT

Applicant hereby amends paragraph 8 of the above-captioned application so that the description of the authority which applicant seeks shall now read as follows:

To transport (1) trailers (excluding mobile homes, travel trailers, and office trailers), trailer chassis, trailer converter dollies, and containers, and (2) materials, equipment, parts, and supplies used in the manufacture, assembly, servicing, distribution, and sale of the commodities named in (1) above, between points in Pennsylvania;

subject to the following conditions:

1. That no right, power or privilege is granted to render service for Morgan Corp. from its facilities;
2. That no right, power or privilege is granted to render service from the facilities of Boyertown Auto Body;
3. That no right, power or privilege is granted to render service for Cliff Industries; Gelco Space; Guest Trailer Rentals, Inc.; or Sauer Industries, t/d/b/a Central Equipment;
4. That no right, power or privilege is granted to render service for Mellon Stuart Company or Sargent Electric Company, between points in that part of Pennsylvania lying in and west of the counties of Bedford, Blair, Clearfield, Elk and McKean;

5. That no right, power or privilege is granted to transport storage trailers for Ruthrauff, Inc., between points in Pennsylvania located on and west of U.S. Highway Route 15; and
6. That no right, power or privilege is granted to transport wrecked or disabled vehicles, or trailers, and replacement vehicles, or trailers; when the origin or destination point is other than the scene of an accident or breakdown; with the use of flatbed and lowboy trailers; between points in the borough of Hollidaysburg, Blair County, and within an airline distance of one hundred fifty (150) statute miles of the limits of said borough.

TOWAWAY EXPRESS, INC.

By Herbert R. Nurick  
Herbert R. Nurick, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108-1166  
(717) 232-8000

Counsel for Applicant

Dated: March 21, 1986

TOWAWAY EXPRESS, INC.

Tractors Operated By Applicant

<u>MAKE</u>	<u>MODEL</u>	<u>YEAR</u>
International	Single Axle	1977
Mack	Single Axle	1976
GMC	Tandem Axle	1977
Freightliner	Tandem Axle	1974
International	Single Axle	1973
Kenworth	Tandem Axle	1974
International	Single Axle	1985
Freightliner	Tandem Axle	1980
Mack	Tandem Axle	1970
White	Single Axle	1973
White	Tandem Axle	1976
White	Single Axle	1978
White	Single Axle	1978
Marmon	Tandem Axle	1978
GMC	Tandem Axle	1973
International	Single Axle	1969
GMC	Tandem Axle	1979
Ford	Tandem Axle	1970
Peterbilt	Tandem Axle	1980
GMC	Tandem Axle	1970

<u>MAKE</u>	<u>MODEL</u>	<u>YEAR</u>
Kenworth	Tandem Axle	1973
Kenworth	Tandem Axle	1984
White	Tandem Axle	1979
International	Tandem Axle	1975
Freightliner	Tandem Axle	1978
Freightliner	Tandem Axle	1978
Peterbilt	Tandem Axle	1978
White	Single Axle	1978
White	Single Axle	1978
White	Tandem Axle	1974
Ford	Tandem Axle	1974
Volvo	Single Axle	1983
Mack	Single Axle	1979
Ford	Single Axle	1972
International	Tandem Axle	1974
Kenworth	Tandem Axle	1978
International	Tandem Axle	1970
Kenworth	Tandem Axle	1975

TOWAWAY EXPRESS, INC.  
COMPILED FINANCIAL STATEMENTS  
APRIL 30, 1986

TOWAWAY EXPRESS, INC.  
BALANCE SHEET  
AS OF APRIL 30, 1986

ASSETS

Current Assets		
Cash in bank	\$ 139	
Accounts receivable	226,992	
Claim receivable	720	
Due from Contractors	52,884	
Due from employee	2,475	
Prepaid permits	23,793	
Prepaid insurance	32,182	
Prepaid expenses	1,446	
Stock subscription receivable	1,000	
Total Current Assets		\$341,631
Plant Assets		
Property plant and equipment	7,404	
Accumulated depreciation	992	
Net Book Value		6,412
Other Assets		
Authority	5,100	
Deposits	1,965	
Organization Costs	2,695	
Total Other Assets		9,760
Total Assets		\$357,803 =====

LIABILITIES & STOCKHOLDERS' EQUITY

Current Liabilities		
Accounts payable	\$ 74,575	
Due contractors	45,324	
Payroll taxes payable	2,351	
Accrued corporate taxes	10,077	
Bank loan due within one year	70,000	
Bonds payable	945	
Total Current Liabilities		\$203,272
Bank loan due after one year		75,000
Total Liabilities		278,272
Stockholders' Equity		
Common Stock	51,000	
Retained earnings	28,531	
Total Stockholders' Equity		79,531
Total Liabilities and Stockholders' Equity		\$357,803 =====

See accountants' compilation report.

TOWAWAY EXPRESS, INC.  
 OPERATING STATEMENT  
 FOR THE ONE AND SEVEN MONTH PERIODS ENDED APRIL 30, 1986

	<u>MONTH OF APRIL</u>		<u>SEVEN MONTHS YEAR - TO - DATE</u>	
	Actual	Percents	Actual	Percents
Sales	\$197,341	100.00%	\$1,185,838	100.00%
Payments to Contractors	<u>147,621</u>	<u>74.81</u>	<u>889,822</u>	<u>75.04</u>
Gross Margin	49,720	25.19	296,016	24.96
Operating Expenses				
Wages	8,859	4.49	82,147	6.93
Payroll Tax Expense	1,270	.64	8,270	.70
Office supplies	443	.22	3,503	.30
Printing	155	.08	1,220	.10
Telephone	3,526	1.79	25,706	2.17
Dues & Subscriptions	45	.02	227	.02
Rent	1,000	.51	7,000	.59
Fines	135	.07	904	.08
Licenses and Permits	2,400	1.22	10,409	.88
Authority	0	0	0	0
Equipment Rental	75	.04	1,197	.10
Temp. Permit	1,590	.81	11,290	.95
Organization Expense	67	.03	469	.04
Professional Fees	2,383	1.20	6,885	.58
Bank Charges	7	0	724	.06
Postage	384	.19	3,178	.27
Employee Benefit	252	.13	2,821	.24
Travel Expense	510	.26	13,195	1.11
Insurance Expense Trucks	9,490	4.81	46,799	3.95
Insurance Other	44	.02	88	0
Miscellaneous	0	0	121	.01
Depreciation Expense	76	.04	532	.04
Consulting Fees	1,650	.84	8,350	.70
Tolls	2,807	1.42	12,053	1.02
Advertising	253	.13	1,786	.15
Cleaning	0	0	654	.06
Auto Expense	120	.06	755	.06
Commissions	262	.13	710	.06
Interest Expense	1,790	.91	9,045	.76
Total Operating Expenses	<u>39,593</u>	<u>20.06</u>	<u>260,038</u>	<u>21.93</u>
Operating Profit or (Loss)	<u>10,127</u>	<u>5.13</u>	<u>35,978</u>	<u>3.03</u>
Other Income				
Trip Lease	8	0	238	.02
Insurance Surcharge	1,757	.89	1,863	.16
Profit or Loss Before Taxes	<u>11,892</u>	<u>6.02</u>	<u>38,079</u>	<u>3.21</u>
Taxes	3,530	1.79	10,077	.85
Net Profit or (Loss)	<u>\$ 8,362</u>	<u>4.23%</u>	<u>\$ 28,002</u>	<u>2.36%</u>
	=====	=====	=====	=====

See accountants' compilation report.

TOWAWAY EXPRESS, INC.  
RETAINED STATEMENT  
FOR THE SEVEN MONTH PERIOD ENDED APRIL 30, 1986

BEGINNING RETAINED EARNINGS OCTOBER 1, 1985	\$ 529
Net profit or (loss) for the period	<u>28,002</u>
ENDING RETAINED EARNINGS - APRIL 30, 1986	\$28,531 =====

See accountants' compilation report.



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF  
TOWAWAY EXPRESS, INC.  
A-00106208

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VERIFIED STATEMENT OF LEON T. MILNOR

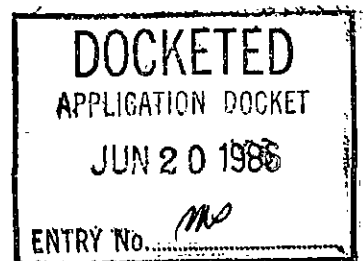
I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY OR FIRM

The legal name and address of the supporting party are Strick Corp. ("Strick"), 225 U.S. Highway No. 1, Fairless Hills, PA 19030. The origin points of concern to Strick will be discussed in item V below.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR SUPPORTING PARTY OR FIRM

I am Leon T. Milnor, corporate traffic manager of Strick. I have been with Strick for 23 years and have held my present position for 18 years. I am the person responsible for arranging for transportation for Strick, and I am authorized to support the instant application of Towaway Express, Inc. ("Towaway"), Docket No. A-00106208.

I point out that Strick pays the freight charges and selects the carrier for both its outbound and inbound shipments. I am fully familiar with Strick's transportation requirements for these shipments.



III. GENERAL DESCRIPTION OF SUPPORTING PARTY, ORGANIZATION OR OPERATIONS

Strick manufactures trailers, containers, trailer chassis, and trailer converter dollies. Strick has leasing branches in 32 major cities for the leasing of the equipment which I just named and employs 600 people in the state of Pennsylvania.

IV. VOLUME AND FREQUENCY OF INTENDED USE

If the instant application is approved, Strick would give Towaway an average of ten to 15 shipments per week outbound from its facilities and five to ten shipments inbound to its facilities, as relevant.

V. SPECIFIC OR REPRESENTATIVE ORIGINS AND DESTINATIONS, OR BOTH

Strick has facilities at the following locations in Pennsylvania:

Berwick, Columbia County - manufacturing plant

Ottawa (Limestone Township), Montour County - manufacturing plant

Leighton, Carbon County - parts plant

Hughesville, Lycoming County - floor plant

Fairless Hills, Bucks County - corporate headquarters, parts center, leasing branch

Cheswick, Allegheny County - leasing branch

Allentown, Lehigh County - leasing branch

I shall give the flow of traffic to and from these facilities at this point:

## Outbound

Berwick - Chassis and dollies are shipped mainly to Philadelphia, and dollies are shipped to major carriers located throughout Pennsylvania. When we manufacture containers, they are shipped from Berwick.

Ottawa - Trailers are shipped to anywhere in the state where a trailer is sold or leased, and this can involve almost any point in the state.

Lehighton - Parts are shipped to Danville, Berwick, and Fairless Hills.

Hughesville - Trailer floors are shipped to Danville, Fairless Hills and to customers throughout the state. Raw lumber is shipped inbound from points throughout the state.

Fairless Hills - Trailers are shipped to the southeastern portion of the state, and parts are shipped all over the state. Containers are shipped from here to points all over the state.

Cheswick - Trailers are delivered to mainly the western part of the state.

Allentown - Trailers are delivered primarily to the northeastern portion of the state.

## Inbound

Berwick - Receives the items covered by part (2) the application ("items") from points in Philadelphia, Scranton, Fairless Hills, Oaks, York, Red Lion, Reading, Bensalem, and Morrisville.

Ottawa - Receives items from points in Philadelphia, Scranton, Lehighton, Wilkes-Barre, Williamsport, York, Hatfield, Fairless Hills, and Cressona.

Lehighton - Receives items from points in Philadelphia, Allentown, Bethlehem, Williamsport, and Fairless Hills.

Hughesville - Receives items from points in Philadelphia, Pittsburgh, and Fairless Hills.

Fairless Hills - Receives items from points in Philadelphia, Danville, Lehigh, Lehighton, Hughesville, Cressona, and Oaks.

I want to make it clear that the specific points named above are merely representative of points to or from which shipments are made involving Strick's facilities. Customers change locations from time to time, and new customers are constantly sought and added. In fact, Strick solicits business throughout the entire state of Pennsylvania and really has commodities covered by the application going to almost all points within the state during the course of a year. Strick also purchases items from suppliers located at various points throughout Pennsylvania during the course of a year, and ships such items outbound from its facilities along with the main commodity. Hence, Strick needs a carrier with broad authority to allow the maximum of flexibility to meet Strick's transportation needs.

VI. TYPE OF SERVICE REQUIRED. DESCRIBE

Strick requires tandem tractors for transporting vans and flatbeds and single-axle tractors for empty trailers, containers, and chassis deliveries.

VII. SIMILAR APPLICATIONS SUPPORTED

Strick supported the application of Gerald T. Stuck, Docket No. A-95370, F.2. In the summer of 1985, Stuck was awarded contract carrier authority to transport semi-trailers, semi-trailer chassis,

semi-trailer bodies, vehicles bodies (except mobile homes), intermodal containers and semi-trailer parts for Strick, between points in Pennsylvania.

Neither Stuck nor other carriers are able to provide the full service which Strick requires throughout the year. Therefore, it is important for Strick to have Towaway available to perform for it between points in Pennsylvania as well as Stuck and other carriers. This is particularly true: (1) since Strick has shipments moving between points in Pennsylvania every day, (2) a carrier that has been serving Strick for 30 years went out of business in the end of 1985, and (3) in view of the chassis plant just opened in 1985 at Berwick, Pennsylvania.

#### VIII. ANY OTHER INFORMATION DEEMED PERTINENT

Strick is well aware of Towaway's ability as a carrier. In fact, Strick utilizes Towaway's service in interstate commerce, and it is an excellent service. It would be a big benefit to Strick if Towaway could serve Strick in intrastate commerce as it does in interstate commerce. Such service would certainly help Strick in competing for customers in Pennsylvania because Strick does not now have carrier availability that some of its competitors have.

Towaway is very familiar with Strick's operations, and having its services available on an intrastate basis would be a tremendous benefit, accommodation, and convenience to Strick.



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF  
TOWAWAY EXPRESS, INC.  
A-00106208

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VERIFIED STATEMENT OF JAMES K. BROWN

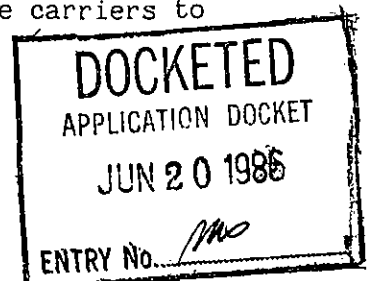
I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY OR FIRM

The legal name and address of the supporting party are Fruehauf Corporation ("Fruehauf"), 10900 Harper Avenue, Detroit, Michigan 48232. The facilities which are pertinent to the application of Towaway Express, Inc. ("Towaway"), at the above-captioned docket number, will be set forth in part 5 of this statement.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR SUPPORTING PARTY OR FIRM

My name is James K. Brown. I am director, traffic and transportation of Fruehauf. I have held this position for four years and, prior to that time, I was the assistant director, traffic and transportation for four years. Over these years, I have become very knowledgeable of the transportation needs of Fruehauf and I am authorized to support this application of Towaway.

Fruehauf pays the freight charges and selects the carriers to perform transportation for it.



III. GENERAL DESCRIPTION OF SUPPORTING PARTY, ORGANIZATION OR OPERATIONS

Fruehauf is the world's largest manufacturer of commercial truck trailers. In addition to manufacturing trailers, Fruehauf also manufactures trailer chassis, trailer converter dollies, and containers. In conjunction with the outbound shipments of its trailers, Fruehauf ships, occasionally, various materials, parts, and supplies used in the manufacture, assembly, servicing, and distribution of its trailers.

IV. VOLUME AND FREQUENCY OF INTENDED USE

If this application is approved, Fruehauf expects to utilize the services of Towaway on an average of five times per week between points in Pennsylvania.

V. SPECIFIC OR REPRESENTATIVE ORIGINS AND DESTINATIONS, OR BOTH

Fruehauf has facilities at different points in Pennsylvania, as I shall now describe. It has production plants at Middletown and Uniontown. The Middletown plant also has a parking area for storage of the trailers to be shipped. This parking area is adjacent to the Middletown plant and is located in Lower Swatara Township, Dauphin County, Pennsylvania. The Middletown plant produces van trailers as well as trailer chassis, trailer converter dollies, and containers. The Uniontown plant produces tank-type trailers, for both liquid and dry-bulk commodities.

Fruehauf has sales and service branches located at Pittsburgh, Dunmore, and Philadelphia, and dealers at Breezewood, Carlisle, Lancaster, Turbotville, Erie, and York.

The trailers, etc., move from the production plants to the sales and service branches, dealers, and directly to customers. From the sales and service branches, our products are shipped primarily to the customers directly, but also to dealers on occasions. Our products are shipped from our dealers to the customers. There are occasions when the product is shipped from the dealers to the sales and service branches and production plants, as well as from the sales and service branches to the production plants. In other words, there are inter-facility movements required by Fruehauf.

Fruehauf has customers throughout the entire Commonwealth of Pennsylvania and any point in the Commonwealth is a potential shipping point for Fruehauf. Basically, the sales and service branches and the dealers serve the areas within a certain radius of the locations of these facilities. Therefore, transportation is required from the locations of these branches and dealers to points within that radius. Beyond that, any one of the production plants, sales and service branches, and dealers, could have shipments from their locations to any point in the state such as, for example, to Stroudsburg, Harrisburg, Allentown, Lebanon, and Altoona--to name a few points to which we are shipping right now that are not exactly within close proximity to our branches and dealers.

Moreover, Fruehauf receives trade-in trailers from its customers, at all of its facilities. Consequently, transportation is needed for these inbound moves, from points all over Pennsylvania.

To be succinct, Fruehauf requires a carrier that can serve it from all of its production plants, branches, and dealers, to all points in Pennsylvania, and vice versa. This will enable Fruehauf to have a carrier which is flexible enough to provide it with the total service coverage Fruehauf requires.

VI. TYPE OF SERVICE REQUIRED. DESCRIBE.

Fruehauf requires a carrier having the type of tractors capable of handling the commodities it ships and receives. Additionally, Fruehauf requires a carrier having "jiff-lox," which are devices enabling the carrier to transport two trailers at a time. Towaway has the type of equipment required to fulfill Fruehauf's transportation needs.

VII. SIMILAR APPLICATIONS SUPPORTED

Fruehauf has not supported any similar applications within the last two years.

VIII. ANY OTHER INFORMATION DEEMED PERTINENT

Fruehauf utilizes the services of Towaway in interstate commerce and is very happy with Towaway's services. Fruehauf knows that Towaway can give Fruehauf the service it requires in intrastate

Pennsylvania commerce. Therefore, Fruehauf supports the present application, as amended, to the fullest extent.



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF

TOWAWAY EXPRESS, INC.  
A-00106208

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VERIFIED STATEMENT OF TIMOTHY WILLIAM RHOADS

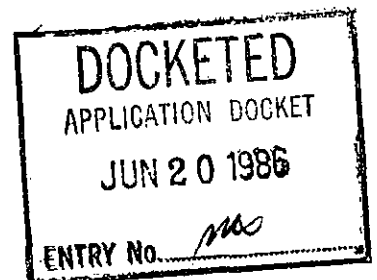
I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY OR FIRM

The legal name and address of the supporting party are Great Dane Lancaster, Inc. ("Great Dane"), 1459 Manheim Pike, Box 4924, Lancaster, PA 17604. The facilities of Great Dane are physically located in Manheim Township, Lancaster County, Pennsylvania.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR SUPPORTING PARTY OR FIRM

I am Timothy William Rhoads, branch manager of Great Dane. I have been with Great Dane since 1971 and have been its branch manager for three and a half years. I am very familiar with Great Dane's operations and transportation needs, and I am authorized to support the application of Towaway Express, Inc. ("applicant") captioned at the top of this page.

Great Dane selects the carriers which it uses and also pays the transportation charges.



### III. GENERAL DESCRIPTION OF SUPPORTING PARTY, ORGANIZATION OR OPERATIONS

Great Dane is basically in the business of selling and servicing trailers. While the company sells its own van and flatbed trailers, it services any make of van, flatbed, or dump trailer and it also services trailer chassis. Additionally, Great Dane sells and services trailer converter dollies, and it is capable of servicing containers.

Great Dane also ships, outbound from its facilities, various equipment, parts, and supplies covered by the application, such as wheels, drums, axles, body extrusions, sheet metal, and posts. These items are sent on the trailers being shipped. Inbound, Great Dane receives all kinds of materials, equipment, parts, and supplies covered by the application at its Manheim Township facilities.

### IV. VOLUME AND FREQUENCY OF INTENDED USE

The use which Great Dane will make of the applicant depends to a large degree on the time of year involved. Great Dane will give the applicant weekly to monthly shipments depending on demand and will make use of the applicant throughout the course of the year.

### V. SPECIFIC OR REPRESENTATIVE ORIGINS AND DESTINATIONS, OR BOTH

Great Dane ships its outbound commodities, which I mentioned earlier, throughout the entire state of Pennsylvania. Virtually all points in the state are destination points for Great Dane. For example, Great Dane ships to the following points which are only

representative of the points to which it ships: Pittsburgh, Philadelphia, Allentown, Norristown, Harrisburg, Lancaster, Reading, Scranton, Wilkes-Barre, Altoona, Bedford, Stroudsburg, Erie, Media, Doylestown, Coatesville, York, Lebanon, New Castle, Johnstown, Punxsutawney, Bradford, Easton, DuBois, Chambersburg, Sunbury, Williamsport, New Castle, Milton, and Greensburg, to name a few.

Although Great Dane's inbound commodities are presently coming from points out of state, such commodities could certainly come from points in Pennsylvania and Great Dane would like to have the flexibility of being able to utilize the applicant from wherever purchases can be made in Pennsylvania.

VI. TYPE OF SERVICE REQUIRED. DESCRIBE

Great Dane requires second-day service and the kind of tractor which is capable of handling the large items which it ships. From using the applicant in interstate commerce, Great Dane is satisfied that the applicant has the type of equipment required by Great Dane.

VII. SIMILAR APPLICATIONS SUPPORTED

Great Dane has not supported any similar applications.

VIII. ANY OTHER INFORMATION DEEMED PERTINENT

I reiterate that Great Dane utilizes the services of applicant in interstate commerce. Applicant is a good carrier, and Great Dane has had no problems with its service. Great Dane would like to have

this same service available to it in intrastate commerce and,  
therefore, urges the Commission to approve the instant application, as  
amended, in its entirety.



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF

TOWAWAY EXPRESS, INC.  
A-00106208

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VERIFIED STATEMENT OF FRANK W. SPRINGER

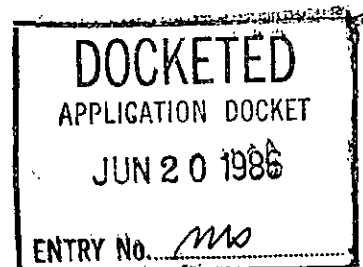
I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY OR FIRM

The legal name and domicile of the supporting party are Thayco Trailer Corp. ("Thayco"), Upper Uwchlan Township, Chester County.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR SUPPORTING PARTY OR FIRM

I am Frank W. Springer, manager of traffic of Thayco. I have held this position for about 17 years with Thayco and its predecessor, and I am quite familiar with all phases of Thayco's transportation needs. In fact, I am the person responsible for arranging for transportation for Thayco.

I am authorized to support the application of Towaway Express, Inc. ("applicant") now before the Pennsylvania Public Utility Commission. My company pays the freight charges and selects the carrier for its outbound and inbound shipments.



III. GENERAL DESCRIPTION OF SUPPORTING PARTY, ORGANIZATION OR OPERATIONS

Thayco is in the business of manufacturing and selling trailers, as well as selling trailer converter dollies, and trailer chassis. Thayco expects to sell containers in the future.

IV. VOLUME AND FREQUENCY OF INTENDED USE

If the instant application is approved, Thayco intends to give the applicant ten trips per week which will result in an average of 40 trips per month, and 500 trips per year, outbound from Thayco's facilities, to points in Pennsylvania. Of course, this depends on the change in requirements of the public. On an inbound basis, depending on the number of trade-in trailers involved in Thayco's sales, Thayco estimates that it will give the applicant two trips of trade-in trailers per week which averages about eight trips per month and 100 trips per year.

Thayco ships the commodities covered by part (2) of the application both outbound and inbound to and from Pennsylvania points. These commodities are transported with Thayco's product outbound, but are shipped separately inbound. Thayco's own trailers would be used for the inbound shipments and use of applicant for this purpose will increase the inbound frequency of use just stated by me.

V. SPECIFIC OR REPRESENTATIVE ORIGINS AND DESTINATIONS, OR BOTH

The origin point for Thayco's shipments is the village of Eagle in Upper Uwchlan Township, Chester County. From these facilities, Thayco presently ships all the commodities covered by the application, except containers, to points throughout the state, of which the following are only representative: Philadelphia, Tannersville, Harrisburg, York, Lancaster, Mount Pocono, Allentown, Reading, Coopersburg, West Chester, Carlisle, Camp Hill, Pittsburgh, and Erie. It receives trade-in trailers at its facilities from all of the representative points just named. It is important to recognize at this point that Thayco has sales throughout the entire state of Pennsylvania; and, therefore, it could be shipping, at any particular time, to any point in the state. Furthermore, Thayco could also be receiving trade-in trailers, and the commodities in part (2) of the application, from any point in the state. Consequently, it is imperative that Thayco have a carrier which holds broad enough authority to perform service to and from all points in the state.

VI. TYPE OF SERVICE REQUIRED. DESCRIBE

Thayco requires single-axle tractors for the delivery of new trailers. Pickups generally must be made the same day the trailers are available and delivered the same or following day, depending on distance. Additionally, Thayco requires tractors equipped with jiff-loks to deliver double trailers.

VII. SIMILAR APPLICATIONS SUPPORTED

Thayco has not supported any similar applications for at least two years, except for the ETA and TA applications of applicant to transport trailers from our facilities to Middlesex Township, Cumberland County, Pennsylvania, in order to fulfill a new order in a short period of time.

VIII. ANY OTHER INFORMATION DEEMED PERTINENT

There are several special features which are attractive about the applicant's service that other carriers do not have. In the first place, applicant's terminal is within a reasonable distance to Thayco's Eagle plant, and this will enable applicant to provide service on a timely basis. Secondly, Thayco needs another authorized carrier to handle all of its intrastate Pennsylvania traffic. Thirdly, the applicant provides service to Thayco in interstate commerce and is very familiar with the handling of Thayco's trailers. It would be a tremendous benefit to Thayco if the applicant could serve it in intrastate commerce as it does in interstate commerce. I add that applicant's interstate service is very satisfactory.

Thayco's daily shipments to various destinations rise and fall depending upon customer needs. Thayco must respond quickly to these needs in order to obtain and keep its customers. Having the service of applicant available will aid us in this regard.

The applicant's management has a good record in the industry, and we would like to be able to utilize the applicant and its management experience to assist us in meeting our transportation needs.

For all the above reasons, Thayco requests that the Commission approve the present application, as amended, in its entirety.

A-F-F-I-D-A-V-I-T

COMMONWEALTH OF PENNSYLVANIA :  
  : SS:  
COUNTY OF CHESTER                  :

Frank W. Springer, being duly sworn according to law, deposes and says that he has read the foregoing statement, knows the contents thereof, and that the same are true and correct as stated, to the best of his knowledge, information, and belief.

Frank W. Springer  
Frank W. Springer

Sworn to and subscribed  
before me this 6 day  
of June, 1986.

Carol D. Faccioli  
Notary Public

(SEAL)

My commission expires:

CAROL D. FACCIOLLI, Notary Public  
Uwchland Twp., Chester Co.  
My Commission Expires March 19, 1990

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF

TOWAWAY EXPRESS, INC.  
A-00106208

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VERIFIED STATEMENT OF DAVID SHINN

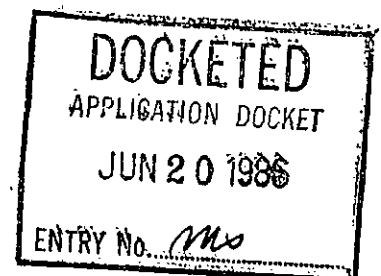
I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY OR FIRM

The legal name of the supporting party is Hertz-Penske Truck Leasing, Inc. ("Hertz-Penske"). Our address is P. O. Box 301, 111 Penske Plaza, Reading, PA 19603. The facilities involved in the instant application will be discussed by me in Part V of this statement.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR SUPPORTING PARTY OR FIRM

David Shinn is my name. I am fleet scheduling supervisor for Hertz-Penske. I have held this position for two and half years, and I am quite familiar with all phases of our transportation needs. I am authorized to support the application of Towaway Express, Inc. ("applicant") at Docket No. A-00106208.

Hertz-Penske selects the carriers it uses to perform transportation for it and also pays the freight charges assessed by those carriers.



III. GENERAL DESCRIPTION OF SUPPORTING PARTY, ORGANIZATION OR OPERATIONS

Hertz-Penske is in the business of renting and leasing trailers, as relevant, to the general public as well as to the trucking industry. While Hertz-Penske deals primarily in trailers, it also rents and leases trailer chassis, and trailer converter dollies.

IV. VOLUME AND FREQUENCY OF INTENDED USE

Hertz-Penske presently intends to give the applicant ten trips per month between points in Pennsylvania.

V. SPECIFIC OR REPRESENTATIVE ORIGINS AND DESTINATIONS, OR BOTH

The transportation to be performed by the applicant will, basically, be from Hertz-Penske facility to Hertz-Penske facility. These facilities are located at Reading, Philadelphia, Hazleton, Pittsburgh, York, Allentown, Aston, Johnstown, King of Prussia, Lancaster, Phoenixville, Williamsport, and Sharon.

VI. TYPE OF SERVICE REQUIRED. DESCRIBE.

Hertz-Penske requires expedited delivery including pickups within 24 hours from time of request, and delivery within 24 hours of pickup.

VII. SIMILAR APPLICATIONS SUPPORTED

Hertz-Penske has not supported any similar applications.

VIII. ANY OTHER INFORMATION DEEMED PERTINENT

Hertz-Penske utilizes the services of the applicant in interstate commerce. Based on service and reputation, the applicant is Hertz-Penske's top choice and Hertz-Penske would like to have applicant available to it for transportation between points in Pennsylvania.



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF

TOWAWAY EXPRESS, INC.  
A-00106208

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VERIFIED STATEMENT OF EDWARD E. PAULIN

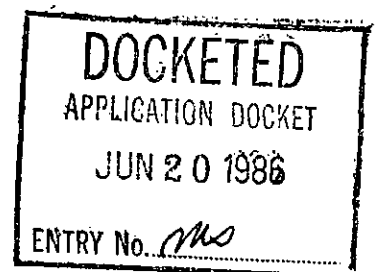
I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY OR FIRM

The legal name and domicile of the supporting party are West Point Trailer Supply ("West Point"), Upper Gwynedd Township, Montgomery County, Pennsylvania.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR SUPPORTING PARTY OR FIRM

My name is Edward E. Paulin, and I am the general manager of West Point. I have been with West Point for four years and have been the general manager for four years. I am very familiar with all of West Point's transportation needs and am the person responsible for arranging for transportation for West Point.

I have been authorized by West Point to support the application of Towaway Express, Inc. ("Towaway") at the docket number set forth at the top of this page. West Point pays the freight charges and selects the carrier to perform transportation for it.



III. GENERAL DESCRIPTION OF SUPPORTING PARTY, ORGANIZATION OR OPERATIONS

West Point sells new and used truck trailers, trailer chassis, and trailer converter dollies, and it also sells used containers. Furthermore, West Point sells materials, equipment, parts and supplies covered by part (2) of the application.

IV. VOLUME AND FREQUENCY OF INTENDED USE

As relevant to this application, West Point anticipates that it would give Towaway approximately 50 trips per year in the transportation of the commodities in which it deals from its facilities to points in Pennsylvania, and vice versa.

V. SPECIFIC OR REPRESENTATIVE ORIGINS AND DESTINATIONS, OR BOTH

The origin point, for the outbound moves, is the property of West Point in Upper Gwynedd Township, Montgomery County, Pennsylvania. From that point, West Point ships to various places in Pennsylvania such as Philadelphia, Pittsburgh, Allentown, Chester, Williamsport, Scranton, Wilkes-Barre, Harrisburg, York, Lancaster, Altoona, Lewistown, Stroudsburg, Carlisle, Chambersburg, etc.

Of course, West Point solicits business throughout the state of Pennsylvania and, virtually, any point in the state could be a potential shipping point for West Point. Therefore, West Point feels that it is important to have a carrier authorized to serve all points.

West Point receives, at its facilities, trade-in trailers from points throughout Pennsylvania. It also receives items covered by part (2) of the application from various points in Pennsylvania such as Harrisburg, Scranton, and Philadelphia. There are potential suppliers of such items all over the state, and West Point would like to have Towaway available to handle transportation of these items from wherever they may originate.

In short, West Point supports the application, as amended, in full so that West Point will have the broadest transportation coverage possible.

VI. TYPE OF SERVICE REQUIRED. DESCRIBE

West Point requires tractors which are capable of towing the larger products in which it deals. West Point is satisfied that Towaway has this kind of equipment and is also satisfied that Towaway is able to perform the service which West Point seeks to have through support of this application.

West Point would supply trailers to Towaway for handling the smaller items of concern.

VII. SIMILAR APPLICATIONS SUPPORTED

West Point has not supported any other carriers for authority similar to that which Towaway seeks.

VIII. ANY OTHER INFORMATION DEEMED PERTINENT

From West Point's experience in the industry, it firmly believes that Towaway will be able to give West Point a faster service than West Point currently receives from existing services. This will help West Point expedite the shipments of its trailers to its customers and should result in more satisfied customers.

Approval of the instant application would definitely be an accommodation and convenience to West Point.



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:  
APPLICATION OF  
TOWAWAY EXPRESS, INC.  
A-00106208

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VERIFIED STATEMENT OF TANYA ROGERS

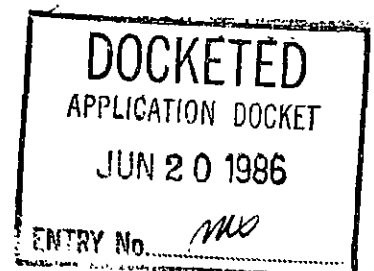
I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY OR FIRM

The name of the supporting firm is The Heil Co. ("Heil"). Its facilities of concern to the instant case are located in West Hempfield Township, Lancaster County, Pennsylvania.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR SUPPORTING PARTY OR FIRM

Tanya Rogers is my name, and I am the plant accountant for Heil. I have been employed by the company for eight years and have held my present position for six years. I am authorized by Heil to support the application captioned at the top of this page.

I am responsible for arranging for transportation for Heil, and am well-informed of its transportation needs. Heil selects the carrier for transportation of its traffic.



III. GENERAL DESCRIPTION OF SUPPORTING PARTY, ORGANIZATION OR OPERATIONS

Heil is a manufacturer of bulk trailers. It also repairs bulk trailers and is involved with materials, equipment, parts and supplies as included in this application.

IV. VOLUME AND FREQUENCY OF INTENDED USE

Heil sends five shipments from its Pennsylvania facilities to other points in Pennsylvania per month. This transportation will increase significantly in the future because there is a large order from a company which will involve transportation of 100 trailers, or ten per month, to Downingtown, Pennsylvania, in the near future. Based on these activities, we know that we will be utilizing the services of the applicant on a monthly basis, but the frequency per month cannot be stated with any precision at this time. Approval of the application will certainly help Heil to satisfy not only its present transportation needs but also its future transportation needs.

Use of applicant for inbound commodities would be to a lesser extent than for outbound, but such use would be made.

V. SPECIFIC OR REPRESENTATIVE ORIGINS AND DESTINATIONS, OR BOTH

Heil ships its trailers and related parts, etc. to various points in Pennsylvania at various times. Presently, it is shipping to Downingtown, Philadelphia, and Pittsburgh. Heil solicits business throughout the entire state, and its destination points vary from time

to time. For example, in the recent past, Heil also shipped to East Earl, and Doylestown. In the future, the shipments could be to almost any point in Pennsylvania. The point is that Heil needs a carrier that has broad enough authority to serve it to any point where Heil may require shipments now and in the future, and from any point for the inbound moves.

VI. TYPE OF SERVICE REQUIRED. DESCRIBE

Heil requires a carrier that will supply a tractor capable of performing a towaway service on a two-day delivery schedule from date of completion. Heil is satisfied that the applicant can perform this service.

VII. SIMILAR APPLICATIONS SUPPORTED

Heil supported an application of Morgan Drive Away, Inc. for authority similar to that which the applicant seeks. However, I want to make it clear that Heil requires the services of both Morgan and the applicant to handle its traffic.

VIII. ANY OTHER INFORMATION DEEMED PERTINENT

I am familiar with the president of Towaway and know that he and his company have a good background in rendering the service which Heil supports at the present time. In fact, Heil utilizes Towaway's service in interstate commerce. Approval of the application would be a benefit to Heil because it will help Heil make timely deliveries of its product

and ensure that Heil has adequate service at the time required.

Overall, approval of the application would serve as an accommodation and convenience to Heil; and Heil respectfully requests that the application, as amended, be approved.



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF

TOWAWAY EXPRESS, INC.  
A-00106208

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VERIFIED STATEMENT OF KENNETH W. HABEN

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY OR FIRM

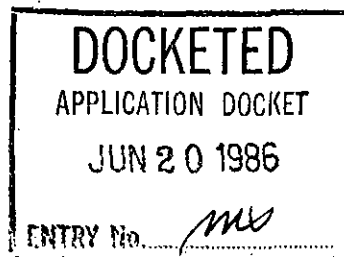
The supporting party is Cobra Mfg. Inc. ("Cobra"), P. O. Box 7858, New Castle, PA 16107. Cobra has facilities in New Castle, Lawrence County, Pennsylvania.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR SUPPORTING PARTY OR FIRM

I am Kenneth W. Haben, and I am the person responsible for arranging for transportation for my company. I am authorized by Cobra to submit this statement in support of the application of Towaway Express, Inc. ("applicant") docketed at A-106208.

Cobra pays the freight charges and selects the carrier to perform transportation for Cobra.

I am fully familiar with Cobra's transportation requirements.



III. GENERAL DESCRIPTION OF SUPPORTING PARTY, ORGANIZATION OR OPERATIONS

Cobra manufactures dump trailers.

IV. VOLUME AND FREQUENCY OF INTENDED USE

If this application is granted, Cobra expects to utilize the applicant at least two times each month for transportation to its dealers in Pennsylvania. Cobra's intrastate Pennsylvania traffic has been increasing, and we expect to have new dealers in the future. Therefore, we anticipate that the volume of Cobra's shipments will increase as will the number of points to which Cobra will ship. Usage of applicant will increase with the increase in traffic.

V. SPECIFIC OR REPRESENTATIVE ORIGINS AND DESTINATIONS, OR BOTH

As I indicated earlier, Cobra's manufacturing facilities are located in New Castle, Lawrence County, Pennsylvania. Cobra presently has dealers to which it ships its trailers at Northampton and Williamsport, Pennsylvania. Because Cobra solicits business throughout the entire state of Pennsylvania, it fully anticipates having dealers at other points in the state. Cobra firmly believes that availability of adequate transportation will help it in its negotiations with obtaining such dealers. The point I make here is that Cobra supports the application to points throughout Pennsylvania so as to be able to use the applicant to whatever point Cobra may have a dealer not only now but in the future.

VI. TYPE OF SERVICE REQUIRED. DESCRIBE

Cobra requires a truck tractor properly outfitted to transport trailers manufactured by it. The applicant has this type of equipment.

VII. SIMILAR APPLICATIONS SUPPORTED

Cobra has not supported any applications similar to the present one.

VIII. ANY OTHER INFORMATION DEEMED PERTINENT

Cobra utilizes the services of the applicant in interstate commerce. Applicant's service is quite satisfactory, and it would benefit Cobra to be able to have that service available also for Pennsylvania intrastate commerce. Actually, having such service available will be of value to Cobra in helping Cobra compete with its competitors and, overall, will serve as an accommodation and convenience to Cobra.

VII. SIMILAR APPLICATIONS SUPPORTED

Dorsey has not supported any similar applications.

VIII. ANY OTHER INFORMATION DEEMED PERTINENT

At the present time, Dorsey is using its own equipment to perform the service which applicant seeks to perform for it. While we attempted to use another service, we were unsuccessful. It would be much more efficient for us to be able to use the applicant, such as we do for interstate service. I have no hesitation in stating that applicant's interstate service for Dorsey has been very satisfactory. Applicant is a reliable company that acts in good faith and performs in a good businesslike manner. It would certainly serve as a convenience and accommodation to us to have applicant's service available for our transportation between points in Pennsylvania.



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re:

APPLICATION OF  
TOWAWAY EXPRESS, INC.  
A-00106208

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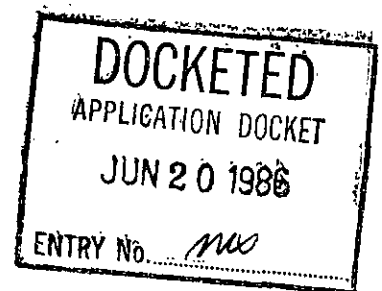
VERIFIED STATEMENT OF LEONARD W. MILLER

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY OR FIRM

The legal name and address of the supporting party are Dorsey Trailers, Inc. ("Dorsey"), R. D. #1, Northumberland, PA 17857. The facilities of Dorsey are located in Point Township, Northumberland County, Pennsylvania.

II. IDENTITY AND QUALIFICATIONS OF PERSON MAKING STATEMENT FOR SUPPORTING PARTY OR FIRM

My name is Leonard W. Miller, and I am the sales coordinator for Dorsey. I have been with Dorsey for 11 years and have been the sales coordinator for five years. I am the person responsible for arranging for transportation for Dorsey, and I am, therefore, completely knowledgeable about Dorsey's transportation needs. I am authorized by Dorsey to support this application. I further note that Dorsey pays the freight charges for its transportation and selects the carrier for its outbound traffic and, at times, for its inbound shipments as well.



III. GENERAL DESCRIPTION OF SUPPORTING PARTY, ORGANIZATION OR OPERATIONS

Dorsey is a manufacturer of commercial trailers, including steel flatbeds and aluminum and steel dump trailers. Dorsey also manufactures trailer chassis.

IV. VOLUME AND FREQUENCY OF INTENDED USE

Dorsey has outbound shipments to Pennsylvania points on an average of once per week and obtains materials, equipment, parts and supplies used in the manufacture of its products from points in Pennsylvania on an average of three to four times per week. While I cannot guarantee how often we would use the applicant's services, I can state that Dorsey would use applicant throughout the year on an inbound basis from points in Pennsylvania to its Point Township facilities, and on a regular basis from Point Township to points in Pennsylvania.

V. SPECIFIC OR REPRESENTATIVE ORIGINS AND DESTINATIONS, OR BOTH

The origin for the outbound trips and the destination for the inbound trips is Point Township, Northumberland County, Pennsylvania. Dorsey ships its products from its facilities to points throughout the Commonwealth of Pennsylvania, the following of which are merely representative: Pittsburgh, Erie, State College, Altoona, Mansfield, Gettysburg, Philadelphia, Lancaster, Wilkes-Barre, York, Scranton, and Stroudsburg. It also receives the various commodities described by me

before from points throughout Pennsylvania of which, again, the following are merely representative: Cressona, Williamsport, York, Lancaster, Milton, Pittsburgh, Philadelphia, and Berwick.

I emphasize that Dorsey solicits business throughout the entire Commonwealth of Pennsylvania, and ships to many different Pennsylvania points during the year. Therefore, it requires a carrier having broad enough authority to perform service to all points. Since Dorsey also receives the inbound traffic from points throughout the state, it is very important that it have a carrier available to perform this service, also from any point in the Commonwealth. Applicant would utilize Dorsey's trailers for inbound shipments and the materials, etc. are also sometimes shipped outbound with the finished trailer itself.

In all, Dorsey's support of this application is to and from all points in the Commonwealth. This is particularly true since Dorsey expects an increase in its Pennsylvania traffic for the future which means not only an increase in volume but also an increase in the points to and from which traffic will move from and to Dorsey's facilities.

VI. TYPE OF SERVICE REQUIRED. DESCRIBE

Dorsey requires tandem and single-axle tractors, as well as prompt service.



June 20, 1986

IN REPLY PLEASE  
REFER TO OUR FILE

Herbert R. Nurick  
Attorney at Law  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

A-00106208 - Application of Towaway Express, Inc.

Dear Sir:

The application of Towaway Express, Inc. for temporary authority has been captioned as attached and will be submitted for review provided no protests are filed on or before July 14, 1986. If protests are filed, you will be advised as to further procedure.

You are further advised that the above application will be published in the Pennsylvania Bulletin of June 21, 1986.

Very truly yours,

David Ehrhart  
Supervisor - Application Section  
Bureau of Transportation

DE:RP:gm  
cc: Applicant  
6780 Carlisle Pike  
Mechanicsburg, PA 17055

**DOCUMENT  
FOLDER**

**DOCKETED**  
APPLICATION DOCKET  
JUN 23 1986  
ENTRY No. *MW*

A-00106208 TOWAWAY EXPRESS, INC. (6780 Carlisle Pike, Mechanicsburg, .....  
Cumberland County, Pennsylvania 17055), a corporation of the Commonwealth .....  
of Pennsylvania - temporary authority - trailers from points in the .....  
township of Upper Uwchlan, Chester County, to points in the township of .....  
Middlesex, Cumberland County. APPLICATION FOR PERMANENT AUTHORITY .....  
APPEARED IN THE PENNSYLVANIA BULLETIN, VOLUME 15, NO. 20, MAY 18, 1985. ....  
Attorney: Herbert R. Nurick, 100 Pine Street, P.O. Box 1166, Harrisburg, .....  
PA 17108-1166.

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION

SERVICE OF NOTICE OF MOTOR CARRIER APPLICATIONS

DATE \_\_\_\_\_

SERVICE \_\_\_\_\_

JUN 21 1986

BUREAU OF TRANSPORTATION  
COMMON CARRIER  
JUNE 1986

A-00106208

Application of Towaway Express, Inc., a corporation of the Commonwealth of Pennsylvania, for temporary authority to transport, as a common carrier, by motor vehicle, trailers from points in the township of Upper Uwchlan, Chester County, to points in the township of Middlesex, Cumberland County. APPLICATION FOR PERMANENT AUTHORITY APPEARED IN THE PENNSYLVANIA BULLETIN, VOLUME 15, NO. 20, MAY 18, 1985.

MW:gm:  
6/5/86

TA Application received: 6/2/86  
TA Application docketed: 6/4/86

NH

DOCUMENT  
FOLDER

DOCKETED  
APPLICATION DOCKET  
JUN 23 1986  
ENTRY No. MW

JUL 14 1986 TA ONLY

Protests due on No Hearings \_\_\_\_\_  
Protests due on Hearings - (5 days prior to date of hearing)  
Notice of the above application was mailed to all certificate holders and railroad companies in the service area as noted above.

# PENNSYLVANIA PUBLIC UTILITY COMMISSION



## RECEIPT

The addressee named hereunder has paid Pennsylvania Public Utility Commission for the following bill, subject to final collection of check or money order tendered for such payment.

Herbert R. Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Date July 24, 1986

**CR 119564 A**

**POCKETED**  
JUL 25 1986

In re application of Towaway Express, Inc.  
A-00106208.....\$75.00

**DOCUMENT  
FOLDER**

Revenue account 01780-17601-102 (cd)

ck 75764 Checks \$75.00 Currency \_\_\_\_\_

Utility account 50:26

C. Joseph Meisinger  
For Department of Revenue