

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :
BUREAU OF TRANSPORTATION AND SAFETY :

V. :

C-2011-2201231

CAPITAL CITY CAB SERVICE, INC. :
362 SOUTH FRONT STREET :
STEELTON, PA 17113 :
A-00113875 :

ANSWER

Respondent Capital City Cab Service, through its attorney Joseph T. Sucec, Esq., respectfully Answers the Commission's Complaint at the present docket number, having been served May 18, 2011, as follows:

1. Admitted.
2. Admitted.
3. Denied. Capital City questioned Chami by telephone, who was in Morocco at the time. Chami denied not running the meter, that the meter at destination was estimated at \$10, and that he was given \$15 and told to "keep it." Capital City obtains log sheets from its drivers on a regular basis. Chami was terminated shortly thereafter. While he returned later in 2010, he was again questioned about the log sheet issue. Chami delayed answering until recently, when he was terminated again for refusing to produce the log sheet in question.
4. Denied as to the factual allegations therein. Averment also contains a conclusion of law, not requiring an answer.
5. Denied as to the factual allegations therein. Averment also contains a conclusion of law, not requiring an answer.
6. Averment number 6 is a Prayer for Relief, which is listed below.

WHEREFORE, Capital City Cab Service respectfully requests that the Complaint of the Bureau of Transportation and Safety be dismissed, with no penalty assessed upon Capital City Cab Service.

Date: 6/7/11

/s/ Joseph T. Sucec, Esq.

Joseph T. Sucec, Esq.
325 Peach Glen-Idaville Road
Gardners, PA 17324
Attorney for Capital City Cab Service
(717)315-2359
joesucec@paonline.com

AFFIDAVIT OF VERIFICATION

As a representative of the Respondent in the ongoing case I swear that the facts above set forth are true and correct to the best of my knowledge, information and belief. I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities as set forth at 52 Pa. Code 1.36.

6/7/11

/s/Ayal Salame
