William J. Lavelle Attorney at Law 2310 Grant Building Pittsburgh, PA 15219

A-00088631, F. 2, Am-D - Application of Forest Hills Transfer and Storage, Inc.

Dear Sir:

The application of Forest Hills Transfer and Storage, Inc. has been captioned as attached and will be submitted for review provided no protests are filed on or before November 17, 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 October 25, 1986.

Very truly yours,

David Ehrhart
Supervisor - Application Section
Bureau of Transportation

DE:RP:rs

cc: Applicant
2101 Ardmore Boulevard
Pittsburgh, PA 15221



DOCKETED
APPLICATION DOCKET
OCT 27 1986
ENTRY No.

A-00088631, Folder 2, Am-D FOREST HILLS TRANSFER AND STORAGE, INC. (2101 Ardmore Boulevard, Pittsburgh, Allegheny, County, Pennsylvania furniture, equipment and household goods, in use, between points in the county of Westmoreland to other points in Pennsylvania, and vice versa: SO AS TO PERMIT the transportation of tabulating machines, calculating machines, computers, copying machines, electronic equipment and other moving household goods, and parts, materials and supplies used in connection therewith, (1) between points in the counties of Allegheny and Westmoreland, ... and from points in said counties, to points in Pennsylvania, and vice versa; and (2) between points in the borough of Saltsburg, Indiana from points in said territory to points in Pennsylvania, and vice versa...., Attorney: William J. Lavelle, 2310 Grant Building, Pittsburgh, Rennsylvania 15219.

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

SERVICE OF NOTICE OF MOTOR CARRIER APPLICATIONS

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NOV 17 1986

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.

PUC-240

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.

Forest Hills Transfer & Storage Co. 2101 Armoure Blvd. Pittsburgh, PA 15221

November 17, 1986

CR 120050



In re application of Forest Hills Transfer and Storage, Inc. A-00088631, F.2, Am-D.....\$125.00

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NOV 13 1983

001780-017601-102 (ck)

ck 11082 hecks_ \$125.00

Currency____

C. Joseph Meisinger

For Department of Revenue

Utility account_

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COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION P.O. BOX 3265, HARRISBURG, Pa. 17120

November 21, 1986

N PEPLY PLEASE

William J. LaVelle Attorney at Law 2310 Grant Building Pittsburgh, PA 15219

A-00088631, F. 2, Am-D
Application of Forest Hills Transfer and Storage, Inc.

Dear Sir:

The above referenced application has been assigned for review without an oral hearing. In order to reach a determination on the application, you are being requested to file a verified statement in accordance with 52 Pa. Code §3.381(e)(l). You will be required to file:

- A. VERIFIED STATEMENT OF APPLICANT
- B. VERIFIED STATEMENTS IN SUPPORT OF APPLICATION.

The verified statement should be in paragraph form. Each heading contained in the attached minimum outline should be a separate section or paragraph.

You are being granted an initial thirty (30) days in which to file the verified statement. The statement is due on or before December 22, 1986.

If additional time is required, it may be requested by telephone but should be followed in writing with the reasons for the extension stated.

Questions about your application should be directed to Lawrence Keener-Farley.

Very truly yours,

Lawrence Keener-Farley

For Peter S. Marzolf, Supervisor Technical Review Section

Bureau of Transportation

APPLICATION DOCKET

NOV 2 1 1986

ENTRY NO. MO

Ву

DOCUMENT FOLDER

471-1800

LAW OFFICES

VUONO, LAVELLE & GRAY

2310 GRANT BUILDING

PITTSBURGH, PA. 15219

WILLIAM J. LAVELLE WILLIAM A. GRAY MARK T. VUONO RICHARD R. WILSON DENNIS J. KYSTURISS

DOON A MHOL

December 17, 1986

Re: Household Goods Carriers Business
Equipment Applications

Mr. Peter S. Marzolf Supervisor Technical Review Section Bureau of Transportation Pennsylvania Public Utility Commission P. O. Box 3265 Harrisburg, PA 17120

A-88631 72 amD

Dear Mr. Marzolf:

We represent the applicants in the sixteen proceedings identified below. The due date for protests in each case expired on November 17, 1986. None of the applications was protested.

Between November 21 and November 26, the Commission assigned each of the applications for handling under the modified procedure and directed that the verified statements be filed, with one exception, between December 22 and December 26, 1986.

In an attempt to expedite the processing of these applications, we began assembling evidence from the applicants and shippers in early November. However, it is now apparent that we will be unable to meet the current due dates for verified statements for a variety of reasons including the inability of the various witnesses to devote sufficient time to the development of the necessary evidence due to the intervening Thanksgiving and Christmas holidays, the sheer volume of work involved in assembling the information and preparing the verified statements for sixteen applications within the short period of time allotted, and an unusually heavy volume of work for this time of year on a number of other matters including hearings which I now have scheduled for December 17, 18, 22, 23 and 24.

For all of these reasons, we request that the present due dates be postponed and that all of the applications be assigned recommon to due date of Monday, February 2, 1987 for the filing of verified to statements. The applications for which this request is mapple care the following:

DEC 19 1986

Applicant and Docket No.

Due Date Assignme

ENTRY No. MO

/ B.F. Fields, Inc. t/d/b/a
B. F. Fields Moving & Storage
Docket No. A-00097902,F. 1,Am-B

<u>2/86</u> Gale E. Travitz *v*



Mr. Peter S. Marzolf Page Two December 17, 1986

3 yr . r

1	Robinson-Ogilvie Moving & Storage, Inc. Docket No. A-00101422,F.1,Am-B	12/22/86	Gale E. Travitz
Ĵ	O'Rourke Storage & Transfer Docket No. A-00090524,F.2,Am-A	12/22/86	Gale E. Travitz
ų	B. H. Stumpf Co., Inc. / Docket No. A-00105669,F.1,Am-A	12/22/86	Lawrence Keener-Farley
✓	Jo Anne Moore, t/d/b/a Anderson Transfer Docket No. A-00099645,F.1,Am-B	12/22/86	Lawrence Keener-Farley
	√ Forest Hills Transfer and Storage, Inc. Docket No. A-00088631, F. 2, Am-D	12/22/86	Lawrence Keener-Farley
	√Parks Moving & Storage, Inc. Docket No. A-00097208,F.1,Am-M	12/24/86	Tim Zeigler 🗸
,	√Weleski Transfer, Inc. Docket No. A-00096502,F.1,Am-D	12/24/86	Tim Zeigler
	<pre>/Tosh Moving & Storage, Inc. Docket No. A-00098380,F.1,Am-B</pre>	12/24/86	Tim Zeigler
,	Vesely Bros. Moving & Storage, Inc. Docket No. A-00102958,F.1,Am-B	12/26/86	Richard H. White
,	/ Century III Services, Inc. Docket No. A-00106464,F.1,Am-A	12/26/86	Richard H. White
,	/Fife Moving & Storage Docket No. A-00094528,F.1,Am-A	12/26/86	Richard H. White
	√Campbell Transfer & Storage Co. Docket No. A-00099334,F.1,Am-B	12/26/86	William P. Hoshour
٧	McNaughton Bros., Inc. Docket No. A-00082096,F.2,Am-N	12/26/86	William P. Hoshour
J	Snyder Brothers Moving, Inc. t/d/b/a George Transportation		
	Company Docket No. A-00086452,F.2,Am-C	12/26/86	Evert R. Hawk

Mr. Peter S. Marzolf Page Three December 17, 1986

Werner-Donaldson Moving Services, Inc.

Docket No. A-00105287, F.1, Am-A

1/9/87

Evert R. Hawk /

Please confirm the extension of the verified statement due dates. We appreciate your cooperation in this matter.

Sincerely yours,

VUONO, LAVELLE & GRAY

William J. Lavelle/R

рz

cc: Ms. Gale E. Travitz

Mr. Lawrence Keener-Farley

Mr. Tim Zeigler

Mr. Richard H. White

Mr. William P. Hoshour

Mr. Evert R. Hawk



COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION P. O. BOX 3265, HARRISBURG, Pa. 17120 December 19, 1986

IN REPLY PLEASE REFER TO OUR FILE

William J. Lavelle Vuono, Lavelle & Gray 2310 Grant Building Pittsburgh, PA 15219

A-00105669, F. I', Am-A, B.H. Stumpf Co., Inc.

A-00099645, F. 1, Am-B, Jo Anne Moore, t/d/b/a Anderson Transfer

A-00088631, F. 2, Am-D, Forest Hills Transfer & Storage, Inc.

Dear Sir:

In accordance with your request of December 17, 1986 for an extension of time to file verified statements, we are granting an additional 42 days for filing of statements.

Please be advised that verified statements are now due on February 2, 1987. If said statements are not filed with this office by that date we shall assume that you do not desire to pursue this matter and shall recommend to the Commission that the application be dismissed for lack of prosecution.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

By Lawrence Keener-Farley For Peter S. Marzolf, Supervisor

Laurince Keener-tarley

Technical Review Section Bureau of Transportation

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

DOCUMENT FOLDER

DOC" ED
APPELL...... SUKET
DEC 2 2 1985
ENTRY No. 0269

PS Form 3811. July 1983 447-845	SENDER: Complete items 1, 2, 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.								
983 4474	Show to whom, date a Restricted Delivery.	nd address of delivery.							
	William J. La 2310 Grant Bu Pittsburgh, I	ilding							
	4. Type of Service: Article Number 9 Process Mail								
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Transp/Tech Rev/LKF/A-88631, F.2, Am-D

LAW OFFICES

Vuono, Lavelle & Gray

2310 GRANT BUILDING

(412) 471-1800

WILLIAM J. LAVELLE WILLIAM A. GRAY MARK T. VUONO RICHARD R. WILSON DENNIS J. KUSTURISS

Re:

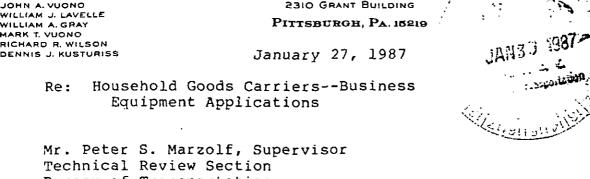
Mr. Peter S. Marzolf, Supervisor Technical Review Section Bureau of Transportation Pennsylvania Public Utility Commission P. O. Box 3265 Harrisburg, PA 17120

Dear Mr. Marzolf:

This will confirm our telephone conversation today concerning 16 applications by household goods carriers to obtain authority to transport business machines and related types of electronic equipment. You consented to a 45 day extension of time for filing verified statements, from February 2, 1987 to March 19, 1987.

We have been working with the 16 applicants and the numerous supporting shippers for several months and have prepared a substantial number of verified statements which are at various stages of completion. However, it is apparent that we will not be able to meet the current due date. applications for which this request is made are the following:

Applicant and Docket No. /B.F. Fields, Inc. t/d/b/a	Current Due Date	Assignment
√ B.F. Fields Moving & Storage Docket No. A-00097902,F.1,Am-B	2/2/87	Gale E. Travitz
/Robinson-Ogilvie Moving & Storage, Inc.		
Docket No. A-00101422,F.1,Am-B	2/2/87	Gale E. Travitz
O'Rourke Storage & Transfer Docket No. A-00090524,F.2,Am-A	2/2/87	Gale E. Travitz
B. H. Stumpf Co., Inc. Docket No. A-00105669,F.1,Am-	2/2/87	Lawrence Reener Farley
√Jo Anne Moore, t/d/b/a Anderson Transfer		APPLIGATION WOCKET
Docket No. A-00099645,F.1,Am-B	2/2/87	Lawrence Keenger Earley
Forest Hills Transfer and		ENTRY NO. MS
Storage, Inc.	0.40.400	
Docket, No. (A-00088631, F.2, Am=D]2/2/87	Lawrence Keener-Farley



Mr. Peter S. Marzolf Page Two January 27, 1987

L-2 1 5-4

<pre> √ Parks Moving & Storage, Inc. Docket No. A-00097208,F.1,Am-M </pre>	2/2/87	Tim Zeigler
√ √ Weleski Transfer, Inc. Docket No. A-00096502,F.1,Am-D	2/2/87	Tim Zeigler
Tosh Moving & Storage, Inc. Docket No. A-00098380,F.1,Am-B	2/2/87	Tim Zeigler
Vesely Bros. Moving & Storage, Inc. Docket No. A-00102958,F.1,Am-B	2/2/87	Richard H. White
Century III Services, Inc. Docket No. A-00106464,F.1,Am-A	2/2/87	Richard H. White
/Fife Moving & Storage, Inc. Docket No. A-00094528,F.1,Am-A	2/2/87	Richard H. White
Campbell Transfer & Storage Co. Docket No. A-00099334,F.1,Am-B	2/2/87	William P. Hoshour
/McNaughton Bros., Inc. / Docket No. A-00082096,F.2,Am-N	2/2/87	William P. Hoshour
Snyder Brothers Moving, Inc. t/d/b/a George Transportation Docket No. A-00086452,F.2,Am-C	2/2/87	Evert R. Hawk
Werner-Donaldson Moving Services, Inc. Docket No. A-00105287,F.1,Am-A	2/2/87	Evert R. Hawk

Please confirm the extension of the verified statement due dates. Thank you for your cooperation in this matter.

Sincerely yours,

VUΦNO, LAVELLE & GRAY

William J. Lavelle

pz

cc: Ms. Gale E. Travitz

Mr. Lawrence Keener-Farley

Mr. Tim Zeigler

Mr. Richard H. White

Mr. William P. Hoshour

Mr. Evert R. Hawk



COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION P. O. BOX 3265, HARRISBURG, Pa. 17120

January 30, 1987

IN REPLY PLEASE
REFER TO OUR FILE

William J. Lavelle
Attorney at Law
2310 Grant Building
Pittsburgh, Pa. 15219

In re: A-00097902, F.1, Am-B; B. F. Fields, Inc. t/d/b/a B. F. Fields
Moving & Storage

A-00101422, F.1, Am-B; Robinson-Ogilvie Moving & Storage, Inc.

A-00090524, F.2, Am-A; O'Rourke Storage & Transfer

A-00105669, F.1, Am-A; B. H. Stumpf Co., Inc.

A-00099645, F.1, Am-B; Jo Anne Moore, t/d/b/a Anderson Transfer (A-00088631, F.2, Am-D; Forest Hills Transfer & Storage, Inc.

A-00097208, F.1, Am-M; Parks Moving & Storage, Inc.

A-00096502, F.1, Am-D; Weleski Transfer, Inc.

A-00098380, F.1, Am-B; Tosh Moving & Storage, Inc.

A-00102958, F.1, Am-B; Vesely Bros. Moving & Storage, Inc.

A-00106464, F.1, Am-A; Century III Services, Inc.

A-00094528, F.1, Am-A Fife Moving & Storage, Inc.

A-00099334, F.1, Am-B; Campbell Transfer & Storage Co.

A-00082096, F.2, Am-N; McNaughton Bros., Inc.

A-00086452, F.2, Am-C; Snyder Brothers Moving, Inc., t/d/b/a

George Transportation

A-00105287, F.1, Am-A; Werner-Donaldson Moving Services, Inc.

Dear Mr. Lavelle:

In accordance with your request of January 27, 1987 for an extension of time to file verified statements, we are granting an additional 45 days for filing of statements.

Please be advised that verified statements are now due on March 19, 1987. If said statements are not filed with this office by that date we shall assume that you do not desire to pursue this matter and shall recommend to the Commission that the application be dismissed for lack of prosecution.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

Technical Review Section

Bureau of Transportation

Peter S. Marzolf, Supervisor

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

DOCUMENT FOLDER DOCKETED APPLICATION DOCKET JAN 3 0 1987

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CLAMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION P. Q. BQX 3265, HARRISBURG, Pa. 17120

March 18, 1987

IN REPLY PLEASE REFER TO OUR FILE

William J. Lavelle
 Attorney at Law
 2310 Grant Building
 Pittsburgh, Pa. 15219

B. F. Fields, Inc. t/d/b/a B. F. Fields In re: A-00097902, F.1, Am-B; Moving & Storage Robinson-Ogilvie Moving & Storage, Inc. A-00101422, F.1, Am-B; A-00090524, F.2, Am-A; O'Rourke Storage & Transfer A-00105669, F.1, Am-A; B. H. Stumpf Co., Inc. Jo Anne Moore, t/d/b/a Anderson Transfer A-00099645, F.1, Am-B; A-00088631, F.2, Am-D; Forest Hills Transfer & Storage, Inc. A-00097208, F.1, Am-M; Parks Moving & Storage, Inc. A-00096502, F.1, Am-D; Weleski Transfer, Inc. A-00098380, F.1, Am-B; Tosh Moving & Storage, Inc. Vesely Bros. Moving & Storage, Inc. A-00102958, F.1, Am-B; A-00106464, F.1, Am-A; Century III Services, Inc. A-00094528, F.1, Am-A; Fife Moving & Storage, Inc. A-00099334, F.1, Am-B; Campbell Transfer & Storage Co. A-00082096, F.2, Am-N; McNaughton Bros., Inc. Snyder Brothers Moving, Inc., t/d/b/a A-00086452, F.2, Am-C; George Transportation A-00105287, F.1, Am-A; Werner-Donaldson Moving Services, Inc.

Dear Mr. Lavelle:

In accordance with your phone request of March 17, 1987 for an extension of time to file verified statements, we are granting an additional 30 days for filing of statements.

Please be advised that verified statements are now due on April 16, 1987. If said statements are not filed with this office by that date we shall assume that you do not desire to pursue this matter and shall recommend to the Commission that the application be dismissed for lack of prosecution.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Peter S. Marzolf, Supervisor Technical Review Section Bureau of Transportation

APPLICATION COOKS

MAD 1 0 1007

ENTRY No. MO

DOCUMENT FOLDER A 15 1

ONOUV.A NHOL WILLIAM J. LAVELLE

WILLIAM A. GRAY MARK T. VUONO RICHARD R. WILSON LAW OFFICES

Vuono, Lavelle & Gray

2310 GRANT BUILDING PITTSBURGH, PA. 15219

Household Goods Carriers -- Business

Technical Review Section Bureau of Transportation Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17120

Dear Mr. Marzolf:

This will confirm our telephone conversation on March 17, that the due date for filing verified statements in connection with the 16 applications described below has been extended from March 19, 1987 to April 16, 1987. Despite our efforts, we have not been able to complete the statements of the 16 applicants and numerous supporting shippers. I appreciate your cooperation in this matter.

The applications for which this request is made are the following, all of which had a March 19, 1987 due date:

Applicant and Docket No.

Assignment

B.F. Fields, Inc. t/d/b/a B.F. Fields Moving & Storage Docket No. A-00097902, F.1, Am-B

Gale E. Travitz

Robinson-Ogilvie Moving & Storage, Inc.

Docket No. A-00101422, F.1, Am-B

Gale E. Travitz

O'Rourke Storage & Transfer Docket No. A-00090524, F.2, Am-A

Gale E. Travitz

B. H. Stumpf Co., Inc. Docket No. A-00105669, F.1, Am-A

Lawrence Keener-Farley

5 6 B B

Cureau Procuportor

Jo Anne Moore, t/d/b/a Anderson Transfer

Docket No. A-00099645, F.1, Am-B

Lawrence Keener-Farley

(412) 471-1800

MAR 24 1987

TRY No...



DENNIS J. KUSTURISS March 19, 1987 Re: Equipment Applications Our File 3275 Mr. Peter S. Marzolf, Supervisor







Mr. Peter S. Marzolf, Supervisor Page Two March 19, 1987

Forest Hills Transfer and Storage, Inc.

Docket No. A-00088631, F. 2, Am-D

Lawrence Keener-Farley

Parks Moving & Storage, Inc. Docket No. A-0009 7028, F.1, Am-M 91208

Tim Zeigler

Weleski Transfer, Inc.

Docket No. A-00006482, F.1, Am-D 96502

Tim Zeigler

Tosh Moving & Storage, Inc. Docket No. A-00098380, F.1, Am-B

Tim Zeigler

Vesely Bros. Moving & Storage, Inc. Docket No. A-00102958, F.1, A, -B

Richard H. White

Century III Services, Inc. Docket No. A-00106464, F.1, Am-A

Richard H. White

Fife Moving & Storage, Inc. Docket No. A-00094528, F.1, Am-A

Richard H. White

Campbell Transfer & Storage Co.

William P. Hoshour

Docket No. A-00099334, F.1, Am-B

McNaughton Bros., Inc. Docket No. A-00082096, F. 2, Am-N William P. Hoshour

Snyder Brothers Moving, Inc. t/d/b/a George Transportation Docket No. A-00086452, F. 2, Am-C

Evert R. Hawk

Werner-Donaldson Moving Services,

Inc.

Docket No. A-00105287, F.1, Am-A

Evert R. Hawk

Sincerely yours,

VUONO, LAVELLE & GRAY

illiam

pz

Ms. Gale E. Travitz

Mr. Lawrence Keener-Farley

Mr. Tim Zeigler

Mr. Richard H. White

Mr. William P. Hoshour

Mr. Evert R. Hawk

JOHN A. VUONO

WILLIAM J. LAVELLE WILLIAM A. GRAY MARK T. VUONO

RICHARD R. WILSON DENNIS J. KUSTURISS

Re:

LAW OFFICES

Vuono Lavelle &/Gra

Forest Hills Moving and Storage, Inc.

Docket No. A-00088631, F. 2, Am-D

2310 GRANT BUILDINGE

PITTSBURGH, PA. 15219

April 16, 1987

(412) 471-1800

APR 16 1987 SECRETARY'S OFFICE **Public Utility Commission**

MAILED WITH POSTAL RECEIPT

APR20 19875

Pap. a. C. Careou Trans

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

Our File 378-19

Dear Mr. Rich:

We enclose for filing with the Commission the signed original and two copies of Applicant's Verified Statement in the above captioned case.

Please acknowledge receipt and filing of the enclosed on the duplicate copy of this letter of transmittal and return it to the undersigned in the stamped, self-addressed envelope provided for that purpose.

Sincerely yours,

VUONO, LAVELLE & GRAY

William J/Lavelle

pΖ

Enclosure

cc: Forest Hills Moving and Storage, Inc.



Before The

Rennsylvania Public Utility Commission

APR20 1987

Pa. U. C.

Irreau Transportation

RECEIVED

DOCKET NO. A-00088631, F.1, Am-D

APR I 6 1987 SECRETARY'S OFFICE Public Utility Commission

APPLICATION OF

FOREST HILLS TRANSFER AND STORAGE, INC.

VERIFIED STATEMENTS IN SUPPORT OF THE APPLICATION

JOHN A. VUONO, ESQ. WILLIAM J. LAVELLE, ESQ. Attorneys for Applicant

Of Counsel: VUONO, LAVELLE & GRAY 2310 Grant Building Pittsburgh, Pennsylvania 15219

Due Date: April 16, 1987

DOCUMENT ?

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11-54 410 MIN

Before the PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A-00088631, F. 1, Am-D

APPLICATION OF FOREST HILLS TRANSFER AND STORAGE, INC.

VERIFIED STATEMENTS IN SUPPORT OF THE APPLICATION

I. STATEMENT OF THE CASE

By application published in the <u>Pennsylvania Bulletin</u> on October 25, 1986, Forest Hills Transfer and Storage, Inc.

(Forest Hills or Applicant) seeks motor common carrier authority as follows:

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 counties of Allegheny and Westmoreland, and from points in said counties to points in Pennsylvania, and vice versa; and (2) between points in the borough of Saltsburg, Indiana County, and within three (3) miles of the limits of said borough, and from points in said territory to points in Pennsylvania, and vice versa.

No protests were filed to the application. Accordingly, the application has been assigned to the Technical Review Section of the Bureau of Transportation for review without an oral hearing. Applicant now submits its verified statements in support of the application.

II. EXPLANATORY STATEMENT

The Applicant presently holds common carrier authority from the Commission to transport household goods and office furniture, in use. Under that authority, Applicant has transported various types of business machines and electronic equipment, believing such transportation to be authorized pursuant to the third proviso of the so-called broad form commodity description. As the Commission is aware, the Interstate Commerce Commission, many years ago, adopted such an interpretation of the third proviso language.

By Order adopted on March 20, 1986 and entered on April 2, 1986, in Pennsylvania Moving & Storage Association, Petition for Declaratory Order, Docket No. P-850090, the Commission, in reliance upon its unreported decision in Application of Bekins Moving & Storage, Docket No. A-00075976, F. 1, Am-D (Order entered February 15, 1978), concluded that the transportation of business machines, new or used, is not within the scope of a carrier's authority to transport articles which require specialized handling and equipment usually employed in moving household goods.

As a result of that Commission Order, Applicant filed this application in order to obtain specific authority to transport those commodities previously believed to be covered by the broad form commodity description. Those commodities are embraced by the requested commodity description which reads "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. In addition, Applicant is requesting the right to transport parts, materials and supplies used in connection with the above described business machines. Approval of the application with this commodity description will permit the Applicant to continue to transport business machines and related commodities in a manner consistent with the interpretation of the Interstate Commerce Commission.

There is no intention by the Applicant to expand its existing service area. Accordingly, the territorial scope of the application is identical to the territory in which the Applicant is presently authorized to transport household goods, with only minor variations in language to eliminate ambiguities or state the authority in terms currently used by the Commission.

This application is one of a large number filed for the same purpose and being processed simultaneously. The evidence being submitted consists of the verified statement of the Applicant, to which is attached a traffic exhibit showing representative movements of involved commodities which the Applicant transported prior to the filing of the application. There is also being submitted the verified statements of supporting shippers which have had and continue to have a need for this type of transportation service. As the Commission well knows, it is difficult under any circumstances to obtain support for household goods type applications. That difficulty has been somewhat

more pronounced in this proceeding since only a limited category of commodities is involved, and the limited segment of the public which ships or receives such commodities has had the services of household goods carriers available in the past and is not fully conversant with the Commission's decisions nor the legal issues which have given rise to the filing of the application. For that reason, it is requested that the Commission, in reviewing this application, take into consideration not only the evidence submitted in support of the specific application, but also the cumulative support presented in connection with all of the similar applications, since the totality of the evidence more clearly demonstrates the widespread need for this type of transportation service to be performed by household goods carriers in Pennsylvania.

After review of all of the evidence, the Commission is requested to grant the application in its entirety.

III. VERIFIED STATEMENT OF JOHN C. ONUFER, JR. ON BEHALF OF FOREST HILLS TRANSFER AND STORAGE, INC.

1. Legal Name and Domicile of Applicant.

Applicant is a Pennsylvania corporation and it has its principal place of business at 2101 Ardmore Boulevard, Pitts-burgh, Allegheny County, PA 15221.

2. Identity and Qualifications of Witness.

My name is John C. Onufer, Jr. My business address is 2101 Ardmore Boulevard, Pittsburgh, PA 15221.

I am the President of Forest Hills and have held that position for approximately ten years. I have been employed by Forest Hills my entire life.

As the President of Applicant, I am familiar with the day-to-day operations of the company, and with its present operating authority, its facilities, its equipment, and its method of operations. I have been authorized by Forest Hills to present this verified statement to the Commission in support of its application at Docket No. A-00088631, F. 2, Am-D.

3. Applicant's Affiliation With Other Carriers.

Forest Hills is not affiliated with any other carrier.

4. Authority Sought.

Forest Hills is requesting authority as a motor common carrier to provide the following service:

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 counties of Allegheny and Westmoreland, and from points in said counties to points in Pennsylvania, and vice versa; and (2) between points in the borough of Saltsburg, Indiana County, and within three (3) miles of the limits of said borough, and from points in said territory to points in Pennsylvania, and vice versa.

5. General Scope of Current Authorized Operations.

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A summary of the present operating authority of Forest
Hills is attached to my statement as Appendix 1. It now holds
authority to transport household goods, furniture, and office
furniture under the authority at Folder 2, paragraphs 5 through
10 of Folder 2, Am-B, and paragraph 1 of Folder 2, Am-C. Collectively, those grants of authority authorize service between
points in the counties of Allegheny and Westmoreland, and from
points in those counties to points in Pennsylvania, and vice
versa; and between points in the borough of Saltsburg, Indiana
County, and within three miles of the limits of Saltsburg, and
from points in that territory to points in Pennsylvania, and
vice versa. The territorial scope of the present application is
the same as that set forth in these existing grants of authority.

Forest Hills also holds authority under the second paragraph of Folder 2, Am-C to transport electronic computers between points in Allegheny County.

6. Duplicating Authority Which Will Result from a Grant of Authority.

Approval of the application will result in duplication to the extent of the authority to transport electronic computers between points in Allegheny County. That commodity description is not all-inclusive of the authority sought by this application. Otherwise, there is no other duplication of existing operating authority. Forest Hills does not object to a restriction being placed in any grant of new authority which would state that to the extent the grant duplicates authority now held by or subsequently granted to Forest Hills, it shall not be construed as conferring more than one operating right.

7. Dual Operations Resulting from a Grant of Authority.

Approval of this application will not result in any dual operations since Forest Hills does not hold any contract carrier authority from this Commission.

8. Pertinent Terminal Facilities and Communications Network.

Forest Hills maintains two facilities in western Pennsylvania. The main office and terminal are located on Ardmore Boulevard in Forest Hills, a suburb of Pittsburgh in Allegheny County. The second terminal is located at Stanton Ave. and Cribbs Street, South Greensburg, Westmoreland County, PA. The terminals have a combined 70,000 square feet of space. At both facilities, Forest Hills has all of the equipment necessary to load and unload motor vehicles as well as storage space.

Both facilities are open for business between 8:00 a.m. and 5:00 p.m. on weekdays and between 8:00 a.m. and noon on Saturdays.

We have had no need to install any communications system other than normal telephone lines for purposes of keeping in contact with drivers or customers.

9. Pertinent Equipment.

Forest Hills owns and operates a large number of different types of equipment in order to meet the varying needs of its customers. Currently, Forest Hills owns the following equipment: 15 tractors; 13 single-unit straight vans; 52 closed vans with flat floors; 13 closed vans with drop frames; one closed drop frame van in which is mounted a crane to assist in loading and unloading; one closed van with a side door to facilitate loading and unloading; 25 open top trailers which are equipped with secure tarpaulins; one low-boy trailer; and seven small vans and/or station wagons which are used as packing vans. The closed vans range in length from 30 feet to 45 feet. The open top trailers range in length from 40 feet to 45 feet.

In addition to the various configurations, the Forest Hills equipment includes padded vans, special locking and tie-down devices, air-ride trailers to provide a smooth ride, power tail-gates to insure safe loading and unloading, hydraulic dollies to move heavy equipment, special ramps, hoisting equipment, power hand trucks, various pieces of hydraulic equipment, and various types of special packaging material.

10. Safety Program.

Forest Hills employs two full-time mechanics and has its own inspection station. All of the equipment is maintained in excellent condition.

Periodic safety meetings are held with the drivers and other personnel in order to review safety matters and impress upon them the necessity of safe driving habits. In addition to the safety meetings, we use various safety messages displayed on bulletin boards and printed payroll handout materials. The company has an outstanding safety record and works hard to maintain strict compliance with the safety regulations of the Commission and the Department of Transportation.

11. Type of Service Currently Provided to the Supporting Shippers.

Applicant has transported the involved commodities under its present household goods authority. That authority authorizes the transportation of these commodities when they are part of a residential, office, business or similar type of relocation. From the performance of that service, Forest Hills and its employees have become experienced in the transportation of business machines and electronic equipment. The company has also transported these commodities unrelated to a relocation under the belief that such service was permissible under the third proviso of the broad form household goods commodity description. The same type of service is required in both In order to adequately serve all of our customers, we must be able to transport these business machines not only as part of a relocation but also when they must be handled on an individual basis for reasons unrelated to a relocation.

12. Type of Service to be Offered.

Forest Hills concentrates on the transportation of house-hold goods, office furniture, business machines, and other commodities normally handled by carriers of these commodities. It has a full range of motor vehicle equipment and accessorial equipment in order to properly transport these types of commodities.

Forest Hills regularly is involved in handling office and business relocations. These frequently require the relocation of various types of business machines such as computers, copying machines, word processing machines, etc. Such shipments are now permitted under the household goods authority which the Applicant presently holds.

The company is also regularly called upon to transport all types of business machines to or from customer locations which are not part of an office or business relocation. Some customers simply require that a business machine be picked up at a supplier and delivered to the office, or that a business machine be taken from the customer's office to some other location such as the supplier. Other customers are involved in the production of business machines. They require motor carrier service between their facilities and either the end user or suppliers of component parts.

In all of these situations, Forest Hills is required to provide the proper type of motor vehicle equipment and the accessorial services which will result in the safe movement of these expensive and often fragile pieces of equipment.

All of our employees are trained in handling business machines. The have been trained in the proper methods of moving the equipment not only over the road but between the vehicle and the interior point to or from which a business machine must be moved. This includes the proper use of ramps, cranes, power liftgates, hydraulic equipment, the negotiation of stairways and narrow corridors, etc. They are also trained in the proper methods of tying down and bracing the business machines when they are loaded in the vehicle so that they do not shift and become damaged while in transit.

In transporting these machines, we frequently are required to pick up and deliver at specific times. There is often a salesman or an installer involved as well as the customer's own personnel. In order to avoid as much idle time as possible, the move is coordinated so that all essential personnel are assembled at definite times. For our part, we must have our truck and driver at the origin and destination at the specified time so that others are not inconvenienced. In these situations, we maintain close communication with everyone involved so that the schedules are coordinated and idle time is kept to a minimum.

13. Financial Data.

There is attached to my statement as Appendix 2 the balance sheet of Forest Hills as of September 30, 1986, which is the latest balance sheet available. At that time, the company had total equity in excess of \$3,373,000, and its current assets exceeded its current liabilities by about \$475,000. There has

been no significant change in the Applicant's balance sheet since that time.

Appendix 3 is the income and expense statement of Forest Hills for the first nine months of 1986. Through that period, the company had an operating income of more than \$554,000 on gross revenues of \$2,216,000. The total year results were comparable and the company was profitable during 1986.

It is clear from the financial statements attached that Forest Hills is in a very strong financial position to undertake the service proposed by this application.

14. Feasibility of Operations.

The Applicant is presently transporting traffic throughout Pennsylvania and the surrounding states. It would have no difficulty in handling this additional traffic within Pennsylvania. Equipment which is used on the outbound movements would return freight from the destination area back into the Pittsburgh area, or the equipment would be routed on to perhaps a point in an adjacent state to make a pickup for delivery to some point throughout the company system. Part of the Applicant' success in the past is due to its ability to coordinate loads throughout its system so that empty mileage is kept to a minimum. We see no difficulty in continuing this practice should the application be approved.

FOREST HILLS TRANSFER AND STOLLIGE, INC.

SECTION 1

OPERATING AUTHORITY

FOLDER 2 .

TO TRANSPORT, AS A CLASS D CARRIER, HOUSEHOLD GOODS AND FUR-NITURE IN USE, BETWEEN POINTS IN THE COUNTY OF ALLEGHENY.

TO TRANSPORT, AS A CLASS D CARRIER, HOUSEHOLD GOODS AND FUR-NITURE IN USE, FROM POINTS IN SAID COUNTY TO OTHER POINTS IN PENNSYLVANIA.

TO TRANSPORT, AS A CLASS D CARRIER, HOUSEHOLD GOODS AND FURNITURE IN USE, FROM POINTS IN PENNSYLVANIA TO POINTS IN THE COUNTY OF ALLEGHENY; SUBJECT TO THE CONDITION THAT THE SERVICE HEREIN AUTHORIZED IS LIMITED AND RESTRICTED TO MOVEMENTS WHERE THE ORDER FOR SERVICE IS RECEIVED AT THE CERTIFICATE HOLDER'S OFFICE IN ALLEGHENY COUNTY.

FOLDER 2 AM-B

TO TRANSPORT COAL, AS A CLASS D CARRIER, FROM MINÈS IN THE COUNTY OF WESTMORELAND, TO POINTS IN THE CITY OF GREENSBURG, WESTMORELAND COUNTY, AND WITHIN THREE (3) MILES OF THE LIMITS OF SAID CITY.

TO TRANSPORT STORE GOODS AND FIXTURES AND PIANOS, AS A CLASS D CARRIER, FROM POINTS IN THE CITY OF GREENSBURG, WESTMORELAND COUNTY, AND WITHIN FIFTEEN (15) MILES, BY THE USUALLY TRAVELED HIGHWAYS, OF THE LIMITS OF SAID CITY, INCLUDING THE VILLAGES OF BELMONT AND SLICKVILLE, WESTMORELAND COUNTY, TO OTHER POINTS IN PENNSYLVANIA, AND VICE VERSA, PROVIDED, THAT NO RIGHT, POWER OR PRIVILEGE IS GRANTED TO SERVE ALLEGHENY COUNTY POINTS EXCEPT FOR SERVICE BETWEEN SUCH POINTS, AND POINTS WITHIN FIFTEEN (15) MILES, BY THE USUALLY TRAVELED HIGHWAYS, OF THE LIMITS OF THE CITY OF GREENSBURG, WESTMORELAND COUNTY.

TO TRANSPORT FARM PRODUCTS, EXCAVATED MATERIALS AND ROAD AND BUILDING CONSTRUCTION MATERIALS SUCH AS ARE USUALLY TRANSPORTED IN DUMP TRUCKS, AS A CLASS D CARRIER, BETWEEN POINTS IN THE CITY OF GREENSBURG AND WITHIN TEN (10) MILES, BY THE USUALLY TRAVELED HIGHWAYS, OF THE LIMITS OF SAID CITY.

TO TRANSPORT CHRISTMAS TREES, AS A CLASS D CARRIER, FROM RAILROAD SIDINGS IN THE SAID CITY TO POINTS IN THE COUNTY OF WESTMORELAND.

(CONCLUDED ON NEXT PAGE)

FOR EXPLANATION OF ABBREVIATIONS AND REFERENCE MARKS, SEE LAST PAGE OF TARIFF.

ISSUED: December 12, 1980 EFFECTIVE: JANUARY 12, 1981

ISSUED BY:

JOHN C. ONUFER, VICE PRESIDENT

ARDMORE BOULEVARD AND MARION AVENUE
PITTSBURGH, PA 15221

FOREST HILLS TRANSFER AND STORGE, INC.

SECTION 1 OPERATING AUTHORITY

FOLDER 2 AM-B (CONCLUDED)

TO TRANSPORT PROPERTY, EXCLUDING HOUSEHOLD GOODS AND OFFICE FURNITURE AND EQUIPMENT IN USE, AS A CLASS B CARRIER, BETWEEN POINTS IN THE CITY OF GREENSBURG, WESTMORELAND COUNTY, AND WITHIN THREE (3) MILES OF THE LIMITS OF SAID CITY.

TO TRANSPORT PROPERTY, EXCLUDING HOUSEHOLD GOODS AND OFFICE FURNITURE AND EQUIPMENT IN USE, AS A CLASS D CARRIER, FROM POINTS WITHIN THE CITY OF GREENSBURG, WESTMORELAND COUNTY, AND WITHIN THREE (3) MILES OF THE LIMITS OF SAID CITY TO POINTS WITHIN TEN (10) MILES, BY THE USUALLY TRAVELED HIGHWAYS, OF THE LIMITS OF SAID CITY.

TO TRANSPORT OFFICE FURNITURE, EQUIPMENT AND HOUSEHOLD GOODS IN USE, AS A CLASS D CARRIER, BETWEEN POINTS IN THE COUNTY OF WESTMORELAND.

TO TRANSPORT OFFICE FURNITURE, EQUIPMENT AND HOUSEHOLD GOODS IN USE, AS A CLASS D CARRIER, FROM POINTS IN THE COUNTY OF WESTMORELAND TO OTHER POINTS IN PENNSYLVANIA AND VICE VERSA.

TO TRANSPORT OFFICE FURNITURE EQUIPMENT AND HOUSEHOLD GOODS IN USE, AS A CLASS B CARRIER, BETWEEN POINTS IN THE BOROUGH OF SALTSBURG, INDIANA COUNTY, AND WITHIN THREE (3) MILES OF THE LIMITS OF SALD BOROUGH.

TO TRANSPORT OFFICE FURNITURE, EQUIPMENT AND HOUSEHOLD GOODS IN USE, AS A CLASS D CARRIER, FROM POINTS IN THE BOROUGH OF SALTSBURG, INDIANA COUNTY, AND WITHIN THREE (3) MILES OF THE LIMITS OF SAID BOROUGH TO OTHER POINTS IN PENNSYLVANIA AND VICE VERSA.

FOR EXPLANATION OF ABBREVIATIONS AND REFERENCE MARKS, SEE LAST PAGE OF TARIFF.

ISSUED: December 12, 1980 EFFECT

EFFECTIVE: JANUARY 12, 1981

ISSUED BY:

JOHN C. ONUFER, VICE PRESIDENT ARDMORE BOULEVARD AND MARION AVENUE PITTSBURGH, PA 15221

FOREST HILLS TRANSFER AND STOLLER, INC.

SECTION 1

OPERATING AUTHORITY

FOLDER 2 AM-C

- (1) To transport, as a Class D carrier, fixtures, equipment and the property usual in a store, office, museum, institution, laboratory, hospital, home or other establishment, when a part of the stock equipment, or supply of such store, office, museum, institution, laboratory, hospital, home or other establishment, in connection with a removal from one location to another, and requiring specialized handling or specialized equipment, usually employed in moving household goods, between points in the Counties of Allegheny and Westmoreland and from points in said counties to other points in Pennsylvania, and vice versa.
- (2) To transport, as a Class D carrier, electronic computers, between points in the County of Allegheny.

SUBJECT TO THE FOLLOWING CONDITION:

THAT NO RIGHT, POWER OR PRIVILEGE IS GRANTED TO TRANSPORT PROPERTY REQUIRING THE USE OF CARRYALLS, HOME TRAILERS AND/OR WINCH TRUCKS OR TRAILERS.

FOLDER 3

TO TRANSPORT, AS A CLASS D CARRIER, ANY MATERIAL OR ANY COM-BINATION OF MATERIALS THAT SPONTANEOUSLY EMITS IONIZING RADIATION (EXCLUDING THE TRANSPORTATION OF SUCH MATERIALS IN BULK IN TANK VEHICLES), FROM THE PLANTS AND INSTALLATIONS OF WESTINGHOUSE ELECTRIC CORPORATION LOCATED IN THE BOROUGHS OF CHESWICK, FOREST HILLS, JEFFERSON AND WEST MIFFLIN AND THE TOWNSHIPS OF FINDLEY, NORTH FAYETTE, ALLEGHENY COUNTY, AND THE TOWNSHIP OF HEMPFIELD, WESTMORELAND COUNTY, TO POINTS IN PENNSYLVANIA AND VICE VERSA.

TO TRANSPORT, AS A CLASS D CARRIER, LABORATORY MATERIALS AND SUPPLIES USED IN THE PRODUCTION OF ANY MATERIAL OR ANY COMBINATION OF MATERIALS THAT SPONTANEOUSLY EMITS IONIZING RADIATION IN PACKAGES WEIGHING NOT MORE THAN FIVE HUNDRED (500) POUNDS EACH, FROM THE PLANTS AND INSTALLATIONS OF WESTINGHOUSE ELECTRIC CORPORATION LOCATED IN THE BOROUGHS OF CHESWICK, FOREST HILLS, JEFFERSON AND WEST MIFFLIN AND THE TOWNSHIPS OF FINDLEY, NORTH FAYETTE, ALLEGHENY COUNTY, AND THE TOWNSHIP OF HEMPFIELD, WESTMORELAND COUNTY, TO POINTS IN PENNSYLVANIA AND VICE VERSA.

FOR EXPLANATION OF ABBREVIATIONS AND REFERENCE MARKS, SEE LAST PAGE OF TARIFF.

ISSUED: DECEMBER 12, 1980 EFFECTIVE: JANUARY 12, 1981

ISSUED BY:

JOHN C. ONUFER, VICE PRESIDENT

ARDMORE BOULEVARD AND MARION AVENUE

PITTSBURGH, PA 15221

FOREST HILLS TRANSFER & STORAGE CO. INC. BALANCE SHEET ALL DEPARTMENTS

PAGE

09/30/86

		- - · · -			
ASSETS					
CURRENT ASSETS CASH NOTES RECEIVABLE ACCOUNTS RECEIVABLE PREPAID EXPENSES	\$	118,780.79 71,145.79 445,522.87 326,874.29			
TOTAL CURRENT ASSETS			\$	962,323.74	
PROPERTY & EQUIPMENT LAND BUILDINGS REVENUE EQUIPMENT SERVICE CARS SHOP & GARAGE EQUIPMENT FURNITURE & FIXTURES FUEL TANKS - S.C. MISCELLANEOUS EQUIPMENT PAVING LEASEHOLD IMPROVEMENTS	\$	213,720.11 1,800,736.50 2,065,653.87 134,955.48 80,753.00 144,201.53 6,500.00 110,014.95 75,759.51 47,350.58			
TOTAL ACCUMULATED DEPRECIATION		4,679,645.53 2,450,964.46)		
PROPERTY & EQUIPMENT- NET	,	may may may the that the days the that the the	\$	2,228,681.07	
OTHER ASSETS INVESTMENTS FRANCHISE CLEARING ACCOUNT	\$	613,090.29 53,500.00 3,600.00			
TOTAL OTHER ASSETS			\$	670,190.29	
TOTAL ASSETS				*****	\$ 3,861,195.1

FOREST HILLS TRANSFER & STORAGE BALANCE SHEET ALL DEPARTMENTS

09/30/86

	TOTAL LIABILITIES & EQUITY					\$ 3,861,195.10
	TOTAL EQUITY			\$	3,373,574.45	
	NET INCOME (LOSS)		260,828.36			
	RETAINED EARNINGS		3,064,136.39			
Į	TREASURY STOCK		499,164.45			
	PAID IN CAPITAL		524,933.15			
	CAPITAL STOCK ISSUED	\$	22,841.00			
	EQUITY ACCOUNTS					
	TOTAL DEFERRED INCOME			\$.00	
	DEFERRED INCOME					
ì	TOTAL CURRENT LIABILITIES			\$	487,620.65	
ı	EST. DAMAGE CLAIMS		6,521.38			
	RENT PAYABLE		40,500.00			
	ACC. FED. INCOME TAX		489,757.00			
	ACCRUED CORP. INC. TAX		98,258.72			
	ACCRUED TAXES		19,830.17			
1	ACCRUED SALARIES		14,071.34			
1	ACCRUED VACATION PAY	,	26,263.00			
	PAYROLL TAXES PAYABLE	(32,062.97)		
	SECURITY DEPOSITS	`	3,276.13	,		
Į	ACCOUNTS PAYABLE-WHEATON	, ,	191,014.92)		
١	CURRENT LIABILITIES ACCOUNTS PAYABLE-EMPLOYEES	\$	12,220.80			
Į	AUDDENM TIADILIMIEA					
	LIABILITIES & EQUITY					

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FOREST HILLS TRANSFER & STORAGE . INC. INCOME & EXPENSE STATEMENT ALL DEPARTMENTS

PAGE

		ALL DEPARTMENTS			
Oll FOR THE PERIOD:	===	•	/01/86 TO	09/30/86	======
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		AMOUNT	-rekiod %	AMOUNT	J-DAIL %
INCOME					
INTERSTATE	\$	417,317.56	48.95 \$	1,234,432.30	55.70
INTRASTATE		22,127.92	2.60 20.84	58,679.02 403,926.69	2.65 18.23
LOCAL CONTAINERS, PACKING/UNPACKING		177,641.77 85,240.53	10.00	165,795.18	7.48
SUPPLEMENTARY TRANSPORT SERV.		92,551.28	10.86	163,474.51	7.38
WAREHOUSING REVENUE		50,133.63	5.88	157,093.68	7.09
COMMISSION REVENUE -INTER.		5,777.89	. 68	28,153.46	1.27
OTHER OPERATING REVENUE		1,748.72	. 21	4,484.07	. 20
TOTAL	\$	852,539.30	100.02 \$	2,216,038.91	100.00
EXPENSES					
SALARIES	Ş	54,946.18	6.45 \$	174,941.69	7.89
WAGES	Y	163,786.20	19.21	472,198.08	21.3
FRINGE BENEFITS		53,888.42	6.32	108,735.21	4.91
PAYROLL TAXES		16,815.55	1.97	62,141.08	2.80
FUEL AND MOTOR OIL		16,457.46	1.93	91,061.24	4.1
TIRES & TUBES		2,813.66	. 33	8,644.25	. 39
VEHICLE REPAIR SUPPLIES		1,167.39	. 14	4,267.19	. 19
VEHICLE REPAIR PARTS		2,580.77	. 30	12,491.38	. 56
REPAIRS & MAINTENANCE OFFICE SUPPLIES		3,820.39 1,301.63	. 45 . 15	11,402.21 6,418.48	. 51
TARIFFS & SCHEDULES		1,091.00	.13	3,232.00	. 1 .
PARKING & CRATING MATERIALS		24,728.74	2.90	37,919.84	1.71
MISCELLANEOUS SUPPLIES		3,717.38	. 44	16,088.12	.73
VEHICLE REPAIRS & MAINTENANCE		9,886.18	1.16	23,668.02	1.07
REPAIRS -OTHER THAN VEHICLE		740.40	.09	2,713.27	. 12
OTHER OUTSIDE SERVICES		7,257.64	. 85	7,152.47	. 32
ADVERTISING		4,944.17	. 58	11,132.97	. 50
UTILITIES		5,337.78	. 63	19,838.10	. 90
COMMUNICATION SERVICES PURCHASED LABOR & TRANSPORT		10,197.48 924.23	1.20 .11	26,702.23 3,587.55	1.20
TRAVEL EXPENSES ~DRIVERS		23,398.42	2.74	72,208.65	.1(3.26
TRAVEL & ENTERTAINMENT		1,270.23	.15	19,532.73	.8
GENERAL EXPENSES		2,752.57	. 32	12,858.92	. 51
DEPRECIATION		89,437.00	10.49	268,311.00	12.1.
AMORTIZATION- LEASE IMPROVE.		344.00	. 04	1,032.00	. 0 !
RENT		16,500.00	1.94	49,500.00	2.2
RENTAL - EQUIPMENT		1,302.45	. 15	7,429.14	. 3.
TAXES & LICENSES		38,121.87	4.47	115,151.29	5.21
PROVISION FOR CLAIMS		3,896.00	. 46	10,909.73	. 4
TOTAL EXPENSES	\$	563,425.19	66.10 \$	1,661,268.84	74.9
OPERATING INCOME	\$	289,114.11	33.92 \$		25.0
RENTAL INCOME	\$	11,816.63	1.39 \$	33,683.48	1.5
EXPENSES -FRAME BUILDING	,	1,769.83	. 21	13,940.70	. 6
EXPENSES - OAKLAND AVENUE		16,896.35	1.98	31,087.83	1.4
EXPENSES -EAST MCKEESPORT		9,637 <u>.</u> 08	1.13	21,035.56	9

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)	
)	ss:
COUNTY OF ALLEGHENY)	

John C. Onufer, Jr., being duly sworn according to law, deposes and says that he has read the foregoing statement, knows the contents thereof, and that the same is true as stated.

John C. Orufer, Jr.

Sworn to and subscribed before me this 3 day of 4?110.

Notary Public

My commission expires:

DAVID G. BAKER, NOTARY PUBLIC FOREST HILLS BORD, ALLEGHENY COUNTY MY COMMISSION EXPIRES MAY 11, 1989 Homber, Pendsylvania Association of Notaries

IV. VERIFIED STATEMENTS OF SUPPORTING SHIPPERS

- 1. American Cimflex Corp. (American Robot Corp.
- 2. Robicon Corporation

VERIFIED STATEMENT OF THOMAS E. KALATA FOR AMERICAN CIMFLEX CORP. (AMERICAN ROBOT CORP.)

1. Legal Name and Domicile of Supporting Shipper.

American Cimflex Corp. (American Robot Corp.) is domiciled at 160 Industry Drive, Pittsburgh, Allegheny County, PA 15275.

2. Identity and Qualifications of Witness.

My name is Thomas E. Kalata. I am the Buyer and Traffic Coordinator for American Cimflex Corp., formerly known as American Robot Corp. My business address is 121 Industry Drive, Pittsburgh, PA 15275.

I have been employed by the company in my present position for three years. I am in charge of all decisions having to do with the transportation activities of the company. I arrange all contracts with carriers and am responsible for the day-to-day movement of the company's freight.

I am very familiar with the company's transportation needs, its experience with the applicant, and the latter's ability to meet those needs. I have been authorized by American Cimflex to provide this statement to the Commission in support of the application of Forest Hills Moving and Storage, Inc. which is docketed at A-00088631, F. 2, Am-D.

3. General Description of Supporting Shipper.

American Cimflex is a manufacturer of robots, vision systems, and various types of controllers. There are two company facilities on Industry Drive. The headquarters of the company is located at 160 Industry Drive. The production plant, which employs some 200 people, is located at 121 Industry Drive. The

headquarters building ships and receives freight five days a week between 8:00 a.m. an 4:30 p.m. It has two loading and unloading doors for motor carriers. The production plant ships and receives freight six days a week between 7:30 a.m. and 5:30 p.m. This facility has four doors for loading and unloading trucks.

Both facilities receive inbound shipments of computers, demo room robots, controllers and vision systems. These inbound articles are received from manufacturers, vendors, wholesalers, and sub-assemblers which do some work for American Cimflex on a contract type basis. The finished products, which consist of robots, controllers and vision systems, are sent to various types of customers including manufacturing companies, such as Rockwell International and Ford Motor Company, and many other business enterprises, many of which are among the Fortune 500.

All shipments are less-than-truckload in size and depending upon the particular item are shipped loose, crated, or packaged. The company routes virtually all of the traffic, both inbound and outbound.

4. Volume and Frequency of Intended Use and Representative Origins and Destinations.

The traffic patterns of American Cimflex fall into several different categories. First, there are outbound shipments to sub-assemblers that do a portion of the work for American Cimflex. They are located at a number of points including the

following for which I have shown the approximate number of ship-ments each year: 60 shipments to Freeport, 12 shipments to Glenshaw, 12 shipments to Oakdale, and 6 shipments to Coraopolis.

The second category of shipments involves those which are sent back to our plant from the sub-assemblers. These include ten shipments a month or 120 shipments a year from Freeport, one shipment a month or 12 shipments a year from Glenshaw, one shipment every other month or six shipments a year from Mars, two shipments a month or 24 shipments a year from Oakdale, and one shipment a month or 12 shipments a year from Aliquippa.

A third type of shipment involves movements from our sub-assemblers direct to a customer, or from a vendor of certain parts direct to a sub-assembler. Representative of those types of movements are seven shipments a year from Monroeville to Freeport, four shipments a year from Coraopolis to Pittsburgh, and 24 shipments a year from Aliquippa to Oakdale.

The fourth category of shipment involves finished products from our plant to customers throughout Pennsylvania. The company has five shipments a year to Pittsburgh, two shipments a year to Allentown, and two shipments a year to Alcoa City.

It is anticipated that the volume of traffic will increase to Pennsylvania points by approximately 20% a year. This is based on the fact that most vendors, machine shops, paint shops, and assembly houses are forecasting increased sales.

5. Type of Service Required.

There are a number of aspects to our service requirements. On outbound shipments, we often have need for split pickups at our two facilities. For example, a truck may have to pick up part of a shipment at the paint shop and the other half at the anodizing shop. That combined shipment may then be delivered to a single sub-assembler, or it may involve a multiple stop-off delivery to two or more sub-assemblers.

We try to schedule pickups and deliveries whenever possible both at our facilities and at those of our customers or sub-assemblers. When schedules are established, it allows everyone involved in the process to know when material must be ready and when to expect the carrier. This minimizes unproductive time for everyone involved. All shipments must be delivered the same day they are picked up.

All of the articles we deal with are very sensitive and easily damaged. They must therefore be handled by drivers who are knowledgeable and who have available to them the special equipment that is necessary. This includes four-wheel dollies, raisers with pads, blanket wraps, straps or tie-downs in the truck, and air-ride motor vehicle equipment with lift tailgates.

Some of the robots and controllers weigh as much as 2,000 pounds and they must be placed in relatively inaccessible areas. This frequently requires that two drivers be assigned to handle a shipment.

American Cimflex has not been satisfied when it has attempted to use non-specialized carriers to transport these shipments. We have had late pickups, late deliveries, excessive time in transit, an absence of specialized handling, an absence of experienced drivers, an absence of specialized equipment, particularly trucks without the air-ride system, and a less than satisfactory tracing procedure.

6. Similar Applications Supported.

Within the last several years, American Cimflex has not supported any other motor carrier for this type of operating authority.

7. Other Pertinent Information.

American Cimflex has used Forest Hills Moving and Storage for about three years and has profited from this experience since Forest Hills has been able to meet our needs and those of our customers and sub-assemblers. Its service has been very good and far superior to that of general freight carriers which do not specialize in the transportation of electronic equipment. These articles are very valuable and it is therefore essential that we continue to be able to use Forest Hills, which has proven itself to be an expert in this type of transportation. American Cimflex will tender all of its shipments, both inbound and outbound, to Forest Hills Moving and Storage.

American Cimflex requests that the Pennsylvania Public Utility Commission grant this application so that this service may continue to be available.

AFFIDAVIT

COMMONWEAL	TH (ЭF	PENNSYLVANIA)	
)	SS:
COUNTY OF	AL	LEB	HENY)	

Thomas E. Kalata, being duly sworn according to law, deposes and says that he has read the foregoing statement, knows the contents thereof, and that the same is true as stated.

Thomas E. Kalata

Sworn to and subscribed

before me this 5 day

of <u>February</u>, 1986.

Notary Public

My commission expires:

DAVID G. BAKER, NOTARY PUBLIC FOREST HILLS BORD, ALLEGHENY COUNTY MY COMMISSION EXPIRES MAY 11, 1989 Member, Penrsylvonia Association of Notaries

VERIFIED STATEMENT OF KENNETH L. SCHMID FOR ROBICON CORPORATION

1. Legal Name and Domicile of Supporting Shipper.

Robicon Corporation is domiciled at 100 Sagamore Hill Road, Pittsburgh, Allegheny County, PA 15239.

2. Identity and Qualifications of Witness.

My name is Kenneth L. Schmid. My business address is 100
Sagamore Hill Road, Pittsburgh, PA 15239. I supervise the shipping department for Robicon Corporation. I have been employed by the company for 22 years and have held my present position for ten years. I am familiar with my company's transportation requirements and its need for the continued service of Forest Hills Moving and Storage, Inc. I have been authorized by Robicon to present this statement to the Pennsylvania Public Utility Commission in support of the Forest Hills application at Docket No. A-00088631, F. 2, Am-D.

3. General Description of Supporting Shipper.

Robicon is a manufacturer of industrial controls. Its products consist of heat regulating apparatus, power supplies and pump controls.

I am attaching copies of pages from several sales brochures which give a brief description of several of our products and have a picture that shows the unit that must be transported.

Appendix I shows a standard arc furnace control system which is used in steel mills and foundries. As the picture shows, the

sophisticated internal mechanism is contained in a steel cabinet which has various meters and dials. Appendix 2 is a picture of a larger operator control station and again shows the computer-ized nature of the internal workings as well as the numerous operators controls. Appendix 3 shows two views of other transformers and control systems. Again, the intricate nature of the internal workings is readily apparent.

The internal workings of this machinery is very delicate and must be transported with a great deal of care in order to avoid damage. The printed circuit boards and metering in this equipment requires special handling. Air-ride vans are necessary to avoid having to go to the additional time and expense of internal bracing in the truck and additional packaging for exterior protection.

It has a production plant in Pittsburgh which employs 250 people. It ships five days a week between 8:00 a.m. and 5:00 p.m. The plant has two doors for loading and unloading motor vehicles.

4. Volume and Frequency of Intended Use and Representative Origins and Destinations.

Outbound shipments of these commodities vary due to individual orders since Robicon is a custom manufacturing facility.

Most of its shipments are less-than-truckload in size.

Attached to my statement as Appendix 4 is a list of ship-ments made from our Pittsburgh facility to points in Pennsyl-vania between October 16, 1985 and December 31, 1986. In each

instance, I have shown the customer and its destination, the shipping date, and the number of individual cabinets with the weight of each. For example, on December 9, 1985 we shipped one cabinet weighing 2,600 pounds to a customer in New Wilmington, Lawrence County. On October 30, 1985, we shipped three cabinets with a total weight of 14,300 pounds and one motor weighing 6,000 pounds to a customer in Monaca, Beaver County. On August 20, 1986, we shipped three cabinets weighing 1,500, 500 and 800 pounds respectively. And on January 30, 1986 we shipped two cabinets weighing 2,000 pounds each, one unit weighing 1,650 pounds and a fourth unit weighing 2,200 pounds. The balance of the entries on Appendix 4 are self-explanatory.

I should point out that in most cases our destinations change from shipment to shipment and there are very few instances in which we have repetitive shipments to the same customer during a short period of time. For that reason it is important that we have a motor carrier that can transport our products to all points in Pennsylvania.

5. Type of Service Required.

Our finished products are susceptible to damage due to the fragile nature of the electronic components. We require that these components be transported on air-ride trailers for the most part. Our products must be tied down to the trailer to prevent them from moving during transit.

Some of the finished products are so large that they must be transported on open-top trailers with protective coverings or

double-drop trailers of the type operated by carriers of house-hold goods. The latter type of trailer is particularly important when the equipment is so large that it must remain on the trailer while the equipment is tested rather than moved into a building.

At destination, the drivers must often assist in unloading the machinery at the customer's site due to a lack of unloading equipment or manpower.

6. Similar Applications Supported.

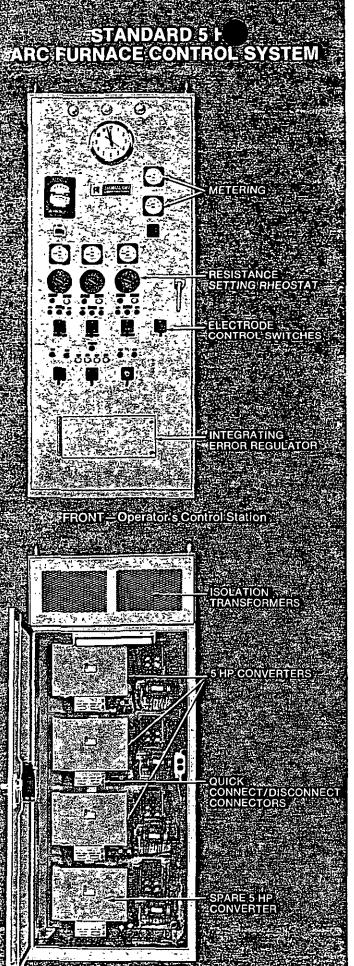
Robicon has not supported any other carrier for similar authority.

7. Other Pertinent Information.

Forest Hills has provided service to Robicon for more than 22 years. We have not had service problems during that time since the company provides a very reliable and timely service and has been able to meet all of our requests for service. In addition to supplying assistance in the loading and unloading of the equipment, Forest Hills has provided pickup and delivery on short notice, and has coordinated the pickup and storage of equipment when a customer's site has not been ready to accept the equipment when we are ready to ship it. This has gotten the finished equipment off our dock and has alleviated what would otherwise have been a crowded shipping and production floor. Forest Hills has also assisted us when customers have unexpectedly returned equipment which was too large for us to handle at

our plant. In those cases, Forest Hills has provided the storage space necessary.

We have looked to Forest Hills to provide a total type of transportation and storage service for many years. We continue to need that service and strongly support its application to the Commission.



Power Section with Motor Drives

SOLID STATE ARC FURNACE CONTROLS for Steel Mills and Foundries

Robicon Arc Furnace Controls consist of a system of solid state control and power handling modules for precise electrode positioning in electric arc furnaces. They are used in new furnace designs and in modernizing older installations for higher through-put and lower maintenance costs.

The patented Integrated Error Regulator (IER) uses resistance sensing to compensate for system reactance while insuring rock solid stability. The benefits are more precise control, higher through-put, and dramatically reduced contactor wear. The fast response and integrating action of IER controls also combine to make the replacement of existing slow DC electrode motors with high speed controls only an interesting alternative. For new furnaces, completely solid state SCR motor drive systems with IER can be provided to position electrodes precisely with full range power adjustment, proportional motor control, and rapid back-out. Proportional, SCR Dual Converter systems eliminate balanced beam relays, contactors or rotating M-G amplifiers. Drive systems with Dual Converter Power stages provide the ultimate in performance and reliability. They are typically used on higher capacity furnaces in steel mills.

FEATURES

- Integrating regulator with resistance sensing more accurately maintain arc setpoint for more constant power input and longer refractory life.
- Resistance sensing compensates for reactance to allow more sensitive action to arc resistance.
- 3. Provide fast response to arc resistance errors.
- Automatic field weakening of DC motor often permits higher electrode speeds for master and automatic raise.
- Auto scrap cave-in reduces furnace trips and electrode breakage.
- Control will interface with plant demand limit and pull up electrodes until arc breaks.
- 7. Integrating action of regulator produces less motor heating, extending motor life.
- Modular design for quick problem identification and component replacement.
- Less maintenance and down time than with old balance beam controls.
- 10. Retrofit using existing DC motors.
- 11. Complete field service backup.





Robicon Corporation
A BARBER-COLMAN COMPANY

SOLID STATE ARC FURNACE CONTROLS

TYPICAL SPECIFICATIONS FOR ARC FURNACE ELECTRODE POSITIONING CONTROL

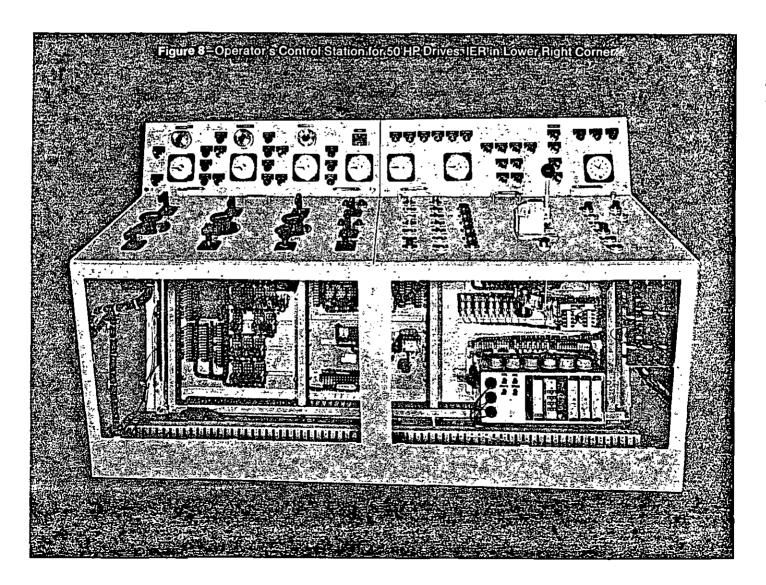
SOLID STATE ELECTRODE POSITIONING CONTROL

The control will perform the function of individually positioning the arc furnace electrodes to maintain the setpoint arc resistance. The system will consist of an operator's control cabinet, DC drive cabinet, 3 isolation transformers, and 3 DC motors.

A. Operator's Console

Operator's control console will contain the following equipment:

- Integrating regulator to control arc resistance (see Section I.E.)
- 2. Arc voltage indicator lamps (3)
- 3. Arc current indicating meters (3)
- Secondary voltage indicating meter with transfer switch for measuring the three phase to phase and the three phase to ground voltages (1)
- 5. Indicating wattmeter (1)
- 6. Indicating varmeter (1)
- 7. Kilowatthour meter (1)



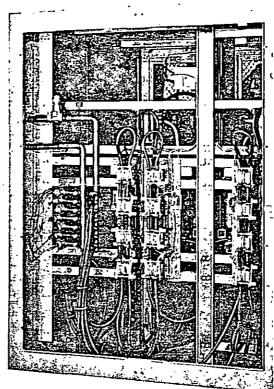
METALS MELTING SCR CONTROL SYSTEMS

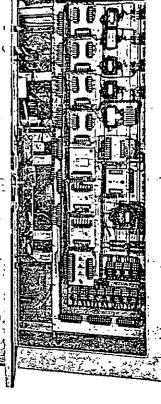
ROBICON

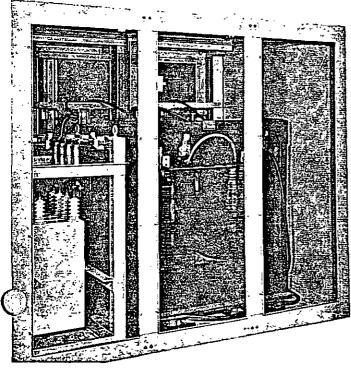
Vacuum Arc Furnaces — VAR

Electroslag Refining Furnaces — ESR

Front and rear views of 15,000 Ampere ESR power conversion system by Robicon. Water cooled SCR thyristors control full load current.







Transformer rated for 2000 KVA and operates from 4160 Volt input line. Note use of Power Factor correction capacitors. Not shown is main line contractor.

APPENDIX 4

LAST THREE MONTHS OF * 1 9 8 5 *

ALL SHIPMENTS ORIGINATING

FROM ROBICON CORPORATION, PITTSBURGH, PA

FINAL DESTINATION	SHIP DATE	CABINETS/WEIGHT	
GEA WIEGAND CORPORATION New Wilmington, PA	12/09/85	1/2600#	
BADGER AMERICA Monaca, PA	10/30/85	3/14,300#TTL WT. 1 Motor/6000#	
LIGHT HOUSE ELECTRIC Brackenridge, PA	10/17/85	1/1500#	
AMERICAN BRIDGE Erie, PA	10/16/85	1/700#	

* 1 9 8 6 *

ALL SHIPMENTS ORIGINATING

FROM ROBICON CORPORATION, PITTSBURGH, PA

FINAL DESTINATION	SHIP DATE	CABINETS/WEIGHT
BOYERTON PACKING Boyerton, PA	12/31/86	1/1000#
McKAMISH-CHESAPEAK, INC. Johnstown, PA	12/19/86	2/800#ea.
BUCKS ENVIRONMENTAL Westchester, PA	11/14/86	1/1300#
ADHESIVE RESEARCH Glen Rock, PA	09/26/86	1/1200#
B.P.OIL Marcus Hook, PA	08/15/86	1/4400#
LONE STAR CEMENT Neville Island, Pittsburgh, PA	08/20/86	3/1500#, 500#, & 800#
LONE STAR CEMENT Neville Island, Pittsburgh, PA	08/01/86	2/2000#, & 800#
P. P. G. Ford City, PA	04/22/86	1/3700# 1 Motor/2000#
NESHAMINY ENVIRONMENTAL Lansdale, PA	02/27/86	3/800#ea.
HOSPITAL OF UNIVERSITY OF F Philadelpia, PA	PA 01/30/86	2/2000#ea. 1 Xfmr/1650# 1 Xfmr/2200#
WESTINGHOUSE Cheswick, PA	01/14/86	1/2400#

AFFIDAVIT

COMMONWEALTH OF	PENNSYLVANIA)	
COUNTY OF ALLE	EGHENY) }	SS:

Kenneth L. Schmid, being duly sworn according to law, deposes and says that he has read the foregoing statement, knows the contents thereof, and that the same is true as stated.

Kenneth L. Schmid

Sworn to and subscribed

before me this __//*L day

of February), 1987. 1987

Q

Notary Public

My commission expires:

CATHLEEN M. MEIER, NOTARY PUBLIC MONROEVILLE BORO, ALLEGHENY COUNTY MY COMMISSION EXPIRES MARCH 7, 1988

Member, Pennsylvania Association of Number

V. ARGUMENT

The Applicant, as indicated in its verified statement and in the Explanatory Statement, has provided the public with a needed and valuable service in the belief that the transportation service proposed was already authorized by its household goods operating authority. The commodities, consisting of various types of business machines, computers and other electronic equipment, because of their high intrinsic value and susceptibility to damage, must be transported with a great deal of care.

The shipping public has in fact regularly used the services of household goods carriers to transport these machines because they are uniquely qualified to provide the service. Household goods carriers operate specialized types of motor vehicle equipment which is better able to protect these machines from damage while in transit. The vans and trailers have air-ride suspension systems which reduce road vibration and jarring which can damage the delicate internal mechanisms of the The trailers and vans are also equipped with special machines. tie-downs, straps, braces, pads and other similar devices which can hold the machine securely in place and prevent it from shifting and bumping into the side of the vehicle or other freight on the vehicle. The motor vehicle equipment operated by household goods carriers is therefore much different than that operated by other types of carriers and is particularly suitable for the transportation of these machines.

To facilitate loading and unloading, much of the equipment has power lift tail-gates, which allow the heavy machines to be

raised or lowered from street level to the bed of the truck. This eliminates the potential damage hazard if the machines had to be lifted manually. It also eliminates the need to have special loading equipment such as forklift trucks available at a customer's site. Many shippers and receivers of these machines do not have such equipment and it would be difficult and uneconomical for the carrier to take such equipment to a site to pickup or deliver one or two machines. Household goods carriers also have special ramps on their trucks which facilitate loading and unloading if the trailer or van does not have a power lift-gate or if such equipment is not suitable in a particular situation.

A further unique aspect of the service provided by house-hold goods carriers, as opposed to general freight carriers, is the availability of a wide variety of accessorial equipment often necessary to pickup or deliver a business machine.

Ordinarily, the shipper or receiver, and frequently both, rely on the carrier to pick up the machine at an interior location and deliver it to an interior location. Except when the shipper or receiver is a major manufacturer of business machines, or a warehouseman of business machines, the shippers and receivers usually do not have loading docks to or from which the machine is handled by the motor carrier. Rather, the machines must be moved to or from interior points in a residence, office, business, industrial facility, or similar type of establishment. The motor carrier is expected to deliver the

machine to the point where it will be used, which can be anywhere from the basement to the top floor of a highrise office
building. Household goods carriers, because of the nature of
their business, have all of the accessorial equipment that is
required. They have portable electronic stair-crawlers to
negotiate stairways. They have various types and sizes of dollies with which to move the business machines through corridors.
They have special equipment which allows them to pivot a business machine around a corner or through a narrow doorway without damaging either the machine or the walls or carpeting of
the establishment. Of course, when picking up a business
machine and moving it from an interior location, all of these
accessorial pieces of equipment and services would also come
into play.

The drivers and helpers employed by household goods carriers are specially trained to provide the service described above. Their daily work, whether it be with a business machine or a typical residential or office move, routinely involves the use of all of this equipment and the providing of all of these services. The personnel has also been trained in the proper method of crating or otherwise packaging business machines so that they can be transported without undue risk. They also are trained to assist in the setting up or breaking down of a large business machine into its component parts. This expertise in the transportation of business machines is unique to the household goods carrier.

The Applicant has provided a valuable and much needed transportation service in Pennsylvania. That service is not readily available from other sources nor easily replaced. A segment of the public has seen fit to use this service in the past and has a continuing need for that service in the future. The unique nature of the service offered by the Applicant is further indicated by the fact that no protests were filed to this application. It is clear from the evidence that there is a continuing need for the service of the Applicant, that the Applicant is fully equipped to provide the service, and that approval of the application will serve a useful public purpose. We submit that the evidence warrants approval of the application.

VI. CONCLUSION

For the reasons set forth in the preceding verified statements, Explanatory Statement and Argument, it is respectfully requested that the Commission approve this application in its entirety.

Respectfully submitted,

FOREST HILLS MOVING AND STORAGE, INC.

ву:

William J. Avelle, Esq. Attorney for Applicant

VUONO, LAVELLE & GRAY 2310 Grant Building Pittsburgh, PA 15219 (412) 471-1800

Due Date: April 16, 1987