

April 26, 2013

*Via Electronic Filing*

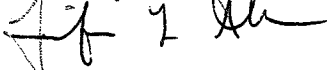
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

RE: Pa. PUC Bureau of Investigation & Enforcement v. AAA East Penn  
Docket No. C-2013-2354574

Dear Secretary Chiavetta:

Enclosed please find AAA East Penn's Answer. A copy of this document has been served upon Wayne T. Scott.

Sincerely,



Jennifer L. Allison  
Attorney for AAA East Penn

Enclosure

cc: Wayne T. Scott (with enclosure)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY :  
COMMISSION BUREAU OF :  
INVESTIGATION AND ENFORCEMENT, :

Complainant, :

vs. :

No: C-2013-2354574

AAA EAST PENN, :

Respondent. :

**ANSWER TO COMPLAINT**

TO THE HONORABLE COMMISSION:

AND NOW comes Respondent, AAA East Penn, by and through its attorneys, Tucker Arensberg, P.C., hereby files the within Answer to Complaint, stating as follows:

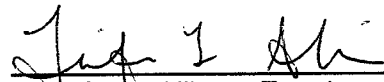
1. Admitted.
2. Admitted. By way of further information AAA East Penn has merged with AAA East Central and does business as AAA East Central.
3. Admitted.
4. It is admitted that Respondent has not maintained evidence of bond insurance on file with this Commission. By way of further information, Respondent no longer operates as a broker to arrange for the transportation of persons and their baggage between points in Pennsylvania. Respondent has filed an Application for Approval of Abandonment or Discontinuance of Service. A copy of this Application, which was filed with the Commission on April 26, 2013 is attached hereto, incorporated herein, and marked Exhibit 1.

5. Admitted. By way of further information, Respondent has not engaged in any transportation brokerage activities in the period when evidence of insurance was not on file with the Commission.

WHEREFORE, Respondent, AAA East Penn, respectfully requests that the Pennsylvania Public Utility Commission discontinue Respondent's Certificate of Public Convenience at A-00119120 and waive the proposed \$500 penalty.

Respectfully submitted,

TUCKER ARENSBERG, P.C.



Jennifer L. Allison, Esquire  
PA I.D. No. 307945

1500 One PPG Place  
Pittsburgh, PA 15222  
(412) 594-5527

Counsel for Respondent

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION BUREAU OF  
INVESTIGATION AND ENFORCEMENT,

Complainant,

vs.

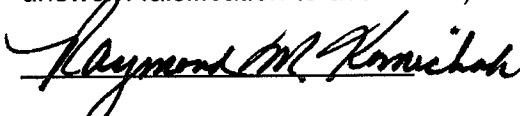
AAA EAST PENN,

Respondent.

No: C-2013-2354574

**VERIFICATION**

I, Raymond M. Komichak, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a 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).



Raymond M. Komichak

4-23-2013

Date

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY :  
COMMISSION BUREAU OF :  
INVESTIGATION AND ENFORCEMENT, :

Complainant, :

vs. :

No: C-2013-2354574

AAA EAST PENN, :

Respondent. :

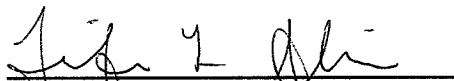
**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participant listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

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

Dated this 26<sup>th</sup> of April, 2013

TUCKER ARENSBERG, P.C.

  
Jennifer L. Allison, Esquire  
PA I.D. No. 307945

1500 One PPG Place  
Pittsburgh, PA 15222  
(412) 594-5527  
(412) 594-5619 (fax)  
jallison@tuckerlaw.com

Counsel for Respondent, AAA East Penn

April 26, 2013

*Via U.S. Mail*

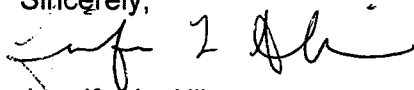
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

RE: AAA East Central, Application for Discontinuance of Service  
Docket No. A-00119220

Dear Secretary Chiavetta:

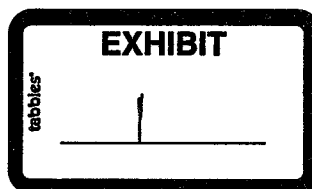
Enclosed please find AAA East Central's Application for Discontinuance.

Sincerely,



Jennifer L. Allison  
Attorney for Duquesne Light Company

Enclosure



**APPLICATION FOR APPROVAL OF ABANDONMENT OR  
DISCONTINUANCE OF SERVICE, IN WHOLE OR IN PART**

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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(See Instructions Before Preparing Application)

**In re:**

Application Docket

No. A-00119220

Folder No. \_\_\_\_\_

For approval of the abandonment or  
discontinuance of common carrier service.

TO PENNSYLVANIA PUBLIC UTILITY COMMISSION:

1. AAA East Central (merged successor to AAA East Penn  
(Name of applicant, and trade name, as it appears on the Certificate  
of Public Convenience.)

1020 W. Hamilton St.  
(Business Street Address)

Allentown, PA 18105-9975 Lehigh County (610) 434-5141  
(City) (State) (Zip) (County) (Telephone)

2. Applicant's attorney (for this application) is:

Jennifer L. Allison, Tucker Arensberg, P.C. 1500 One PPG Place, Pittsburgh,  
PA 15222 (412) 594-5527  
(Name) (Address) (Telephone)

3. Any notice, process or order of the PUC should be served upon:

Jennifer L. Allison, Tucker Arensberg, P.C. 1500 One PPG Place, Pittsburgh,  
PA 15222  
(Name) (Address)

4. This application is for the discontinuance of all of the

service now authorized.

(All or Part)

5. Attach the following, as appropriate (check those attached):

- Exhibit A: A statement of the right or rights to be abandoned or discontinued (required for partial abandonments or discontinuances only).
- Exhibit B: A statement of the revenues and expenses associated with the operation of the service to be discontinued or abandoned.
- Exhibit C: For motor carriers of passengers seeking to discontinue service over any scheduled route also encompassed by interstate operating authority, a statement containing:
  - i. Description of interstate authority;
  - ii. Statement of the extent to which interstate and intrastate revenues received for the service sought to be abandoned are less than the variable costs of providing that service, including depreciation for revenue equipment. This statement shall include a designation of those items claimed to be variable costs; and
  - iii. An estimate of the annual subsidy required, if any, to continue the service.

6. Approval of the application is necessary or proper for the following reasons:

AAA East Penn, merged with AAA East Central in a statutory merger effective January 1, 2011.. Applicant no longer operates as a broker to arrange for the transportation of persons and their baggage between points in Pennsylvania.

Wherefore, Applicant requests the Commission to cancel, or amend the certificate of public convenience, as now held, in conformance with the application.

Applicant sign here:

AAA East Central, merged successor to  
AAA East Penn

By: Raymond M. Komichak

(Corporate Seal)

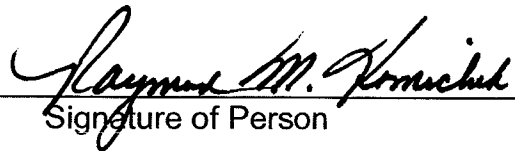
Raymond M. Komichak, Vice President

(If a partnership, each partner must sign; if a corporation, at least one officer must sign and affix corporate seal.)

## VERIFICATION

Raymond M. Komichak, Vice President of AAA East Central, hereby states that  
(Name of Person)

the statements made in the foregoing are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that the estimates therein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

  
Signature of Person

Date: 4-23-2013