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LAW OFFICES

VUONO, LAVELLE & GRAY

2310 GRANT BUILDING
PITTSBURGH, PA 15219

(412) 471-1800

JOHN A. VUONO
WILLIAM J. LAVELLE
WILLIAM A. GRAY
MARK T. VUONO
JON A. ALLEGRETTI

September 20, 1983

Re: Pitt-Ohio Express, Inc.
Docket No. A. 102471, F. 1, Am-C
Our File 2691-5

FEDERAL EXPRESS

RECEIVED

SEP 21 1983

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

Non-Rail Transported
Public Utility Comm.

Dear Mr. Rich:

We enclose for filing with the Commission the signed original and two copies of Applicant's Verified Statements in support of the above-referenced application.

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
William J. Lavelle

lp

Enclosures

cc: Pitt-Ohio Express, Inc., w/enclosure
Heinz USA Division, H. J. Heinz Company, w/enclosure

DOCUMENT
FOLDER

BEFORE THE
Pennsylvania Public Utility Commission

DOCKET NO. A. 102471, FOLDER 1, AM-C
PITT-OHIO EXPRESS, INC.

APPLICANT'S VERIFIED STATEMENTS

RECEIVED

SEP 21 1983

**Non-Rail Transportation
Public Utility Comm.**

WILLIAM J. LAVELLE
Attorney for
PITT-OHIO EXPRESS, INC.
Applicant

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

Due Date: September 21, 1983

DOCKETED APPLICATION DOCKET SEP 21 1983 ENTRY No. <i>7120</i>
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**DOCUMENT
FOLDER**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A. 102471, FOLDER 1, AM-C
PITT-OHIO EXPRESS, INC.

APPLICANT'S VERIFIED STATEMENTS

I. STATEMENT OF THE CASE

By application published in the Pennsylvania Bulletin on June 4, 1983, Pitt-Ohio Express, Inc. (Pitt-Ohio or applicant) seeks authority as a common carrier by motor vehicle, over irregular routes, to provide the following service, as amended:

To transport, as a Class D carrier, food, food products, food stuffs, supplies, equipment and property (except commodities in bulk) for H. J. Heinz Company, U.S.A., between points in Pennsylvania.

The application was originally protested by Wayne W. Sell Corporation and C. L. Feather, Inc. but those protests were withdrawn by their attorney by letter dated July 14, 1983 on the basis of the amendment excluding the transportation of commodities in bulk. In view of the unopposed nature of the application the Commission then assigned the case for review without an oral hearing.

Applicant now submits its verified statements in support of the application.

II. VERIFIED STATEMENT OF ROBERT F. HAMMEL
ON BEHALF OF APPLICANT

1. Legal Name and Domicile of Carrier.

Applicant is Pitt-Ohio Express, Inc. (Pitt-Ohio or applicant), a Pennsylvania corporation, with its principal place of business located at 27th & A.V.R.R., Pittsburgh, PA 15222.

2. Identity and Qualifications of Testifying Witness.

My name is Robert F. Hammel and I am Secretary of applicant. I have held this position since the company was incorporated approximately four years ago. I am actively involved in the day-to-day operations of Pitt-Ohio and I am thoroughly familiar with its overall operations, facilities, equipment and authority. I am authorized to present this statement to the Commission in support of our company's application pending at Docket No. A. 102471, F. 1, Am-C.

3. Applicant's Affiliation with Other Carriers.

Certain shareholders, officers and directors of applicant have certain interests in the affairs of Hammel's Express, Inc. (Hammel's), and certain other shareholders, officers and directors of Hammel's have certain interests in the affairs of Capp Express, Inc. (Capp).

A. Pitt-Ohio Express, Inc.

Charles L. Hammel, III owns 33 1/3 percent of the issued and outstanding stock and is President and a Director. Robert F. Hammel owns 33 1/3 percent of the stock and is Secretary-Treasurer and a Director. Kenneth W.

Hammel owns 33 1/3 percent of the stock and is Vice President and a Director. No other person has any ownership interest in or is an officer or director of Pitt-Ohio.

B. Hammel's Express, Inc.

Charles L. Hammel, III, Robert F. Hammel and Kenneth W. Hammel each own 12 percent of the issued and outstanding stock of Hammel's which is a motor common carrier that holds authority from this Commission at Docket No. A. 88995.

Charles L. Hammel, Jr. owns 54 percent of the issued and outstanding stock and is President, Treasurer and a Director. Katherine A. Hammel, the wife of Charles L. Hammel, Jr., owns 10 percent of the stock and is Vice President and a Director. Marie A. Hammel, the mother of Charles L. Hammel, Jr., is Corporate Secretary and a Director.

The affiliation between applicant and Hammel's is based on the fact that the three shareholders in the applicant also hold minority stock interests in Hammel's.

C. Capp Express, Inc.

Charles L. Hammel, Jr. owns 54 percent of the issued and outstanding stock and is President, Treasurer and a Director. Katherine A. Hammel owns 10 percent of the issued and outstanding stock and is Secretary and a Director. Marie A. Hammel is the Vice President and a Director. Charles L. Hammel, III, Robert F. Hammel and Kenneth W. Hammel each own 12 percent of the issued and outstanding stock of Capp.

The affiliation between applicant and Capp is based on the fact that the three shareholders of applicant also hold minority stock interests in Capp. There may also be an indirect affiliation based on the fact that Charles L. Hammel, Jr. and Katherine A. Hammel both are shareholders, officers and directors of Hammel's and Capp in which their three sons each have minority stock interests.

4. Authority Sought.

By this application, as initially filed, applicant sought common carrier authority as follows:

To transport, as a Class D carrier, food, food products, food stuffs, supplies, equipment and property, for H. J. Heinz Company, U.S.A., between points in Pennsylvania.

As amended, applicant seeks the above authority but has restricted its request so as to exclude the transportation of commodities in bulk. The amended scope of the application is as set forth in the preceding Statement of the Case.

5. General Scope of Currently Authorized Operations.

Applicant is currently authorized by this Commission to conduct operations in Pennsylvania as a motor common carrier under authority at Docket No. A. 102471, as follows:

To transport, as a Class D carrier, such commodities as are dealt in by retail shoe stores, from the distribution facility of Kinney Service Corp., in the Township of Hampden, Cumberland County, to points in the Counties of Allegheny, Beaver, Butler, Lawrence, Armstrong, Westmoreland, Fayette and Washington.

It is also authorized at Docket No. A. 102471, F.1, Am-A to conduct motor common carrier operations as follows:

To transport, as a Class D carrier, property, from the facilities of USCO Distribution Services, Inc., located in the Borough of McKees Rocks, Allegheny County, to points in Pennsylvania, and vice versa;

subject to the following conditions:

1. That no right, power or privilege is granted to transport commodities in bulk.
2. That no right, power or privilege is granted to transport household goods in use.

In addition, applicant is authorized by the Interstate Commerce Commission to transport general commodities (except Classes A and B explosives, household goods as defined by the Commission, and commodities in bulk), between points in 18 eastern states and the District of Columbia at Docket No. MC-30136 (Sub-No. 2). The authority extends from Massachusetts in the northeast to Wisconsin and Missouri in the west, and as far south as North Carolina. Under this authority applicant is authorized to provide service between all points in Pennsylvania on an interstate basis.

6. Duplicating Authority Which Will Result From Grant of Authority.

Applicant does not hold any permanent authority to provide service for the supporting shipper and will not receive any duplicating authority as a result of a grant of this application.

7. Dual Operations Resulting From Grant of Authority.

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

8. Pertinent Terminal Facilities and Communications Network.

Applicant's main office is located at 27th & A.V.R.R., Pittsburgh, PA. At this location it maintains office facilities and has a parking area for several vehicles. There is a 29 door terminal facility at this location which is jointly used by Hammel's and Capp. Applicant's use of the terminal facilities for freight handling purposes is essentially limited to the use of the dock facilities to interline traffic with other motor carriers. Applicant itself does not conduct any dock handling operations of freight at Pittsburgh in the sense that vehicles are unloaded, the freight worked over the dock, and then reloaded on other of applicant's vehicles.

Applicant also maintains a terminal near the Pennsylvania-Ohio state line in the vicinity of Darlington Township, Beaver County, PA and East Palestine, Columbiana County, Ohio. Applicant refers to this as its East Palestine, Ohio terminal. Applicant leases 16 doors of the complete terminal, as well as office space and a parking area. This terminal is used to handle virtually all of the intrastate and interstate less-than-truckload traffic handled by the applicant.

Applicant also maintains an eight door terminal in Paulsboro, New Jersey. That terminal is equipped to handle both LTL and truckload traffic, and is situated so as to serve the eastern Pennsylvania, New Jersey and Delaware areas.

Applicant's operation is set up on a direct dispatch system in order to facilitate the providing of equipment and service to customers. After delivery of a shipment drivers are instructed to call the main office for

instructions concerning the pickup of return loads, if arrangements have not already been made. Applicant maintains direct telephone communications with its customers in order to coordinate the flow of equipment. Pitt-Ohio maintains almost daily contact with the supporting shipper and will be able to provide service to it on short notice and in an efficient manner.

9. Pertinent Equipment.

There is attached to my statement as Appendix 1 a list of the equipment operated by the applicant. The Appendix indicates for each piece of equipment the company number, year, make, registration number, whether owned or leased, and the original cost of the equipment. All of the leased equipment is leased by applicant from Martera, Inc. which is an equipment leasing company whose stock is owned by Charles L. Hammel, Jr. (54%), Katherine A. Hammel (10%), and their three daughters, my sisters, (each 12%).

The company operates 20 straight trucks (identified by an asterisk next to the company number), 14 closed van trailers (the T series equipment), and 20 tractors.

10. Safety Program.

Applicant maintains a complete safety program which is conducted in compliance with the safety regulations of the Pennsylvania Department of Transportation, the Federal Department of Transportation, the Pennsylvania Public Utility Commission and the Interstate Commerce Commission. Under this program all drivers are investigated and examined prior to employment. Before a driver is allowed to take

charge of the road equipment, he must successfully demonstrate his ability to operate safely such equipment. During the time of his employment he is periodically given safety instructions that require him to meet certain high standards of operation. Our program also includes safety meetings at which films are shown and discussions conducted concerning the safe operation of equipment.

Pitt-Ohio has implemented a preventive maintenance program which requires the checking and servicing of equipment on a regular basis. Every vehicle is given a routine service check every 12,000 miles to insure that it is safe to operate and to avoid possible breakdowns while on the road. We operate a maintenance facility at our main terminal in Pittsburgh which is equipped with two bays for servicing equipment.

Insurance is maintained by Pitt-Ohio in excess of the Commission's requirements.

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

Applicant does not hold any authority currently from this Commission to provide service for the supporting shipper. However, Pitt-Ohio is authorized pursuant to its interstate certificate to transport general commodities for Heinz between all points in 18 states and the District of Columbia. Interstate shipments are being handled for Heinz on a regular basis within this authorized territory.

12. Type of Service to be Offered.

Pitt-Ohio is familiar with the transportation requirements of the shipper and is experienced in handling its freight. Service will be made available generally on a five day per week basis during normal business hours. In unusual circumstances the shipper will be able to obtain pickup and/or delivery service at other than normal business hours Monday through Friday, and on weekends and holidays.

Pitt-Ohio is aware that since the supporting shipper is engaged in the production of various food stuffs which are sold through various wholesalers and retailers throughout Pennsylvania, the timely distribution of the products is essential to its operations. Pitt-Ohio intends to provide Heinz with a scheduled pickup and scheduled delivery service. This will involve making equipment available at the pickup and delivery points at predesignated times so as to avoid congestion, and facilitate the loading and unloading procedures of both the shipper and the receiver. This service will be made available in connection with both outbound and inbound traffic for the shipper.

Pitt-Ohio intends to make available to Heinz a split pickup service involving any combination of its facilities as the need may arise. It will also provide a multiple stop-off delivery service to any compatible combination of destinations.

Insofar as truckload traffic is concerned, applicant intends to provide an overnight delivery service between any two points in Pennsylvania. On less-than-truckload traffic, it proposes to provide as a general rule an overnight delivery service between points which are located within approximately 150 miles of each other, and a second day delivery service for all the other points.

Depending upon the nature of the commodity involved, applicant will make available to the supporting shipper refrigerated and heated trailers in order to protect the commodities from damage due to weather conditions. Applicant intends to continue working closely with the supporting shipper and will make whatever adjustments are necessary in its service from time to time in order to meet any changing needs of the shipper in the future.

13. Financial Data.

There is attached to my statement as Appendix 2 the comparative financial statements of the applicant for calendar years 1981 and 1982 which are the latest available. The balance sheet portion of the financial statement shows that the total shareholders' equity more than doubled from December 31, 1981 to December 31, 1982. It also shows that in both years the company operated at a profit and that in 1982 its income from freight revenue increased by approximately 33% and that its retained earnings almost tripled. Because of the growth of the company additional commitments in equipment and terminal facilities were incurred in 1982.

The financial documents show that Pitt-Ohio is financially able to provide the proposed service. It does not anticipate that any additional equipment, facilities or employees will be necessary to serve Heinz.

14. Feasibility of Operations.

As illustrated by the statement of the supporting shipper, it has a greater volume of traffic outbound to points in Pennsylvania than inbound to its facilities from suppliers and vendors. To that extent, the operations encompassed by the authority here proposed will not be totally in balance on a load for load basis. However, applicant does hold extensive interstate operating authority and is currently generating interstate freight throughout Pennsylvania. Therefore, vehicles which are delivering freight for the supporting shipper at points in Pennsylvania will be available for assignment to handle interstate traffic so as to eliminate to the greatest extent possible any deadhead mileage. Likewise, on inbound shipments it will not be necessary to dispatch empty equipment to a distant point for pickup. Applicant instead will use equipment which is terminated in the vicinity of the shipper of the inbound traffic and that equipment will be used to handle the freight inbound to the supporting shipper. In that way, maximum utilization will be made of the equipment and empty miles will be kept to an absolute minimum. It is in applicant's best interests from the standpoint of efficiency and economy to conduct its operations in such a way that empty mileage is kept to an absolute minimum.

AFFIDAVIT

STATE OF PENNSYLVANIA)
) ss:
COUNTY OF ALLEGHENY)

Robert F. Hammel, 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 as stated.

Robert F. Hammel

Robert F. Hammel

Sworn to and subscribed before me

this 16th day of September, 1983.

Robert E. Taylor
Notary Public

My commission expires:

ROBERT E. TAYLOR, NOTARY PUBLIC
PITTSBURGH, ALLEGHENY COUNTY
MY COMMISSION EXPIRES JUNE 29, 1987
Member, Pennsylvania Association of Notaries

APPENDIX 1

PITT-OHIO EXPRESS, INC.OWNED & LEASED EQUIPMENT LIST

<u>Co. No.</u>	<u>Year</u>	<u>Make</u>	<u>Registration</u>	<u>Owned-O</u> <u>Leased-L</u>	<u>Original Cost</u>
* 43	1977	Mercedes Benz	34403012323406	L	\$18,195.00
* 47	1978	Mercedes Benz	34403012381014	L	20,100.00
* 48	1979	Mercedes Benz	34403012442447	L	19,367.00
* 49	1979	Mercedes Benz	34403012409764	L	19,367.00
* 54	1979	Mercedes Benz	34403012442468	L	19,367.00
* 55	1979	Mercedes Benz	34402012432735	L	19,367.00
* 56	1979	Mercedes Benz	34403012432744	L	19,367.00
* 57	1979	Mercedes Benz	34403012442456	L	19,367.00
* 58	1979	Mercedes Benz	34403012427573	L	19,367.00
* 200	1982	Mack	LBO15591	O	24,500.00
* 201	1982	Mack	LBO15361	O	24,500.00
* 202	1982	Mack	LBO15381	O	24,500.00
* 203	1982	Mack	LBO15413	O	24,500.00
* 204	1982	Mack	LBO15406	O	24,500.00
* 100	1981	GMC	1GDL7D1F1BV555625	O	27,788.00
* 101	1981	GMC	1GDL7D1G2BV557196	O	22,500.00
* 102	1981	GMC	1GDL7D1F6BV568273	O	27,788.00
T522	1979	Fruehauf	HPV-665404	L	10,600.00
T524	1979	Fruehauf	HPV-665403	L	10,600.00
T600	1982	Fruehauf	1H2V0452XBH056708	L	12,895.00
T601	1982	Fruehauf	1H2V04521BH056709	L	12,895.00
T602	1982	Fruehauf	1H2V04528BH056710	L	12,895.00
T603	1982	Fruehauf	1H2V0452XBH056711	L	12,895.00
T604	1982	Fruehauf	1H2V0452XBH056712	L	12,895.00
T605	1982	Fruehauf	2BH056736	L	13,350.00
T606	1982	Fruehauf	2BH056737	L	13,350.00
T607	1982	Fruehauf	2BH056738	L	13,350.00
T608	1982	Fruehauf	2BH056739	L	13,350.00
T609	1982	Fruehauf	2B11056740	L	13,350.00
T528	1979	Strick	235927	L	10,645.00
T530	1979	Strick	235928	L	10,645.00
6	1977	Ford	W90UVX87823	L	23,000.00
15	1972	GMC	THM73ZV502833	L	10,250.00
50	1979	GMC	T49CJ9V591662	L	34,400.00
51	1979	GMC	T49CJ9V591663	L	34,400.00
52	1979	GMC	T49CJ9V625038	O	34,400.00
53	1979	GMC	T49CJ9V625037	O	34,400.00
* 59	1979	Mercedes Benz	344030-12-450581	L	19,367.00
* 60	1979	Mercedes Benz	344030-12-450638	L	19,367.00
* 61	1979	Mercedes Benz	344030-12-450582	L	19,367.00
D-6	1981	Mack	2M2W128Y7BC016586	O	42,000.00
D-7	1981	Mack	2M2W128Y9BC016587	O	42,000.00
D-5	1981	Mack	1M2W130B5BA020313	O	42,000.00
D-8	1983	Mack	4213	O	42,000.00
D-9	1978	Mack	4214	O	42,000.00
D-10	1983	Mack	2M2N166YXDC087709	O	42,000.00

PITT OHIO EXPRESS, INC.

OWNED & LEASED EQUIPMENT LIST

<u>Co. No.</u>	<u>Year</u>	<u>Make</u>	<u>Registration</u>	<u>Owned-O</u> <u>Leased-L</u>	<u>Original Cost</u>
D-11	1982	Mack	2M2W129Y8CC016636	O	\$42,000.00
D-12	1983	Mack	2M2N166Y6DC087710	O	42,000.00
D-14	1983	Mack	2M2N166Y8DC087711	O	42,000.00
D-15	1983	Mack	87714	O	42,000.00
D-16	1983	Mack	87683	O	42,000.00
D-17	1983	Mack	87684	O	42,000.00
D-18	1983	Mack	87606	O	42,000.00
D-19	1983	Mack	87607	O	42,000.00

APPENDIX 2

PITT-OHIO EXPRESS, INC.

COMPARATIVE FINANCIAL STATEMENTS - UNAUDITED

FOR THE

YEARS ENDED DECEMBER 31, 1982 AND 1981

JOSEPH L. BENDER, P.C.
Certified Public Accountant

1876 Stage Court
Allison Park, PA 15101
412 364-5333

The Board of Directors of
Pitt-Ohio Express, Inc.

We have reviewed the accompanying comparative balance sheet of
PITT-OHIO EXPRESS, INC.

as of December 31, 1982 and 1981, and the related statements of income, retained earnings and changes in financial position for the years then ended, in accordance with standards established by the American Institute of Certified Public Accountants. All information included in these financial statements is the representation of the management.

A review consists principally of inquiries of company personnel and analytical procedures applied to financial data. It is substantially less in scope than an examination in accordance with generally accepted auditing standards, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with generally accepted accounting principles.

Joseph L. Bender P. C.

Allison Park, Pennsylvania

February 16, 1983

PITT-OHIO EXPRESS, INC.

COMPARATIVE BALANCE SHEET - UNAUDITED

<u>ASSETS</u>	<u>December 31,</u>	
	<u>1982</u>	<u>1981</u>
<u>CURRENT ASSETS</u>		
Cash in Bank	\$ 77,311	\$ 146,693
Accounts Receivable - Customers	142,395	91,766
Accounts Receivable - Other	10,134	None
Prepaid Items	13,775	4,292
Material & Supplies	12,911	None
<u>TOTAL CURRENT ASSETS</u>	<u>256,526</u>	<u>242,751</u>
<u>FIXED ASSETS AT COST</u>		
Revenue Equipment - D	399,055	118,076
Office Equipment	211	211
Leasehold Improvements	3,188	3,188
	<u>402,454</u>	<u>121,475</u>
Less: Allowance for Depreciation	85,834	20,207
	<u>316,620</u>	<u>101,268</u>
<u>OTHER ASSETS</u>		
Franchises & Organization Costs - E - F	101,173	1,173
Other Intangible Assets - C	None	125,000
	<u>101,173</u>	<u>126,173</u>
Less: Allowance for Amortization	50,841	109,164
	<u>50,332</u>	<u>17,009</u>
<u>TOTAL ASSETS</u>	<u>\$ 623,478</u>	<u>\$ 361,028</u>
<u>LIABILITIES AND SHAREHOLDERS' EQUITY</u>		
<u>CURRENT LIABILITIES</u>		
Equipment Obligations - D	\$ 14,336	\$ 40,000
Accounts Payable	105,368	31,847
Interline Accounts Payable	1,023	235
Payroll Deductions	3,241	1,948
Accrued Salaries & Wages	74,003	71,423
C.O.D.'s Payable	118	None
Accrued Taxes	8,237	4,378
Other Accrued Liabilities	30,406	22,636
Federal & State Income Taxes	18,385	34,371
<u>TOTAL CURRENT LIABILITIES</u>	<u>255,117</u>	<u>206,838</u>
<u>LONG-TERM DEBT</u>		
Note Payable - Other - D	28,676	None
<u>SHAREHOLDERS' EQUITY</u>		
Common Stock	50,000	50,000
Retained Earnings	289,685	104,190
<u>TOTAL SHAREHOLDERS' EQUITY</u>	<u>339,685</u>	<u>154,190</u>
<u>TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY</u>	<u>\$ 623,478</u>	<u>\$ 361,028</u>

The accompanying footnotes are an integral part of these statements.

See Accountants' Review Report.

PITT-OHIO EXPRESS, INC.

COMPARATIVE STATEMENT OF INCOME AND RETAINED EARNINGS - UNAUDITED

<u>INCOME</u>	<u>December 31,</u>	
	<u>1982</u>	<u>1981</u>
Freight Revenue	\$ 1,995,766	\$ 1,482,214
C.O.D. Fees	2,520	867
<u>TOTAL REVENUE</u>	<u>1,998,286</u>	<u>1,483,081</u>
 <u>EXPENSES</u>		
Salaries - Officers	82,200	71,150
Salaries & Wages	522,307	304,528
Other Fringes	89,351	70,079
Operating Supplies & Expenses	338,386	168,393
General Supplies & Expenses	37,766	27,469
Operating Taxes & Licenses	54,816	23,035
Insurance	64,708	51,881
Communications & Utilities	29,911	21,296
Depreciation & Amortization	102,304	60,743
Equipment Rents & Purchased Transportation	477,085	520,696
Building & Office Equipment Rents	15,450	8,050
Miscellaneous Expenses	17,540	6,660
<u>TOTAL EXPENSES</u>	<u>1,831,824</u>	<u>1,333,980</u>
<u>NET OPERATING REVENUE</u>	166,462	149,101
 <u>OTHER INCOME & EXPENSES</u>		
Interest Income	14,126	5,943
Interest Expense	(4,085)	(2,897)
<u>NET PROFIT BEFORE INCOME TAXES</u>	176,503	152,147
Federal & State Income Taxes	39,470	41,040
<u>NET INCOME</u>	137,033	111,107
<u>RETAINED EARNINGS - BEGINNING OF YEAR</u>	104,190	(10,728)
Federal Tax Refund	None	3,811
Prior Period Adjustment	48,462	None
<u>RETAINED EARNINGS - END OF YEAR</u>	<u>\$ 289,685</u>	<u>\$ 104,190</u>

The accompanying footnotes are an integral part of these statements.
See Accountants' Review Report.

PITT-OHIO EXPRESS, INC.COMPARATIVE STATEMENT OF CHANGES IN FINANCIAL POSITION - UNAUDITED

	<u>December 31,</u>	
<u>SOURCE OF WORKING CAPITAL</u>	<u>1982</u>	<u>1981</u>
Net Income	\$ 137,033	\$ 111,107
Depreciation of Fixed Assets	65,627	18,844
Amortization of Covenant	16,442	41,664
Amortization of Organization Expense	235	235
Amortization of Operating Rights	20,000	None
 <u>WORKING CAPITAL PROVIDED FROM OPERATIONS</u>	 239,337	 171,850
Additions to Long-Term Debt	43,012	None
Prior Period Adjustment	48,462	3,811
Decrease in Working Capital	34,504	7,915
	<u>\$ 365,315</u>	<u>\$ 183,576</u>
 <u>APPLICATION OF WORKING CAPITAL</u>		
Additions to Franchises	\$ 70,000	\$ None
Additions to Property, Plant & Equipment	280,979	118,076
Current Maturity of Long-Term Debt	14,336	65,500
Increase in Working Capital	None	None
	<u>\$ 365,315</u>	<u>\$ 183,576</u>
 <u>CHANGES IN WORKING CAPITAL</u>		
Increases (Decreases) in Current Assets		
Cash	\$(69,382)	\$ 116,403
Notes & Accounts Receivable	60,763	21,715
Other Current Assets	22,394	(5,540)
	<u>13,775</u>	<u>132,578</u>
Decreases (Increases) in Current Liabilities		
Notes Payable	25,664	(15,000)
Accounts Payable	(73,521)	(5,947)
Federal & State Income Taxes	15,986	(34,371)
Other Current Liabilities	(16,408)	(85,175)
	<u>(48,279)</u>	<u>(140,493)</u>
 <u>NET INCREASE (DECREASE) IN WORKING CAPITAL</u>	 <u>\$(34,504)</u>	 <u>\$(7,915)</u>

The accompanying footnotes are an integral part of these statements.

See Accountants' Review Report.

PITT-OHIO EXPRESS, INC.

NOTES TO FINANCIAL STATEMENTS - UNAUDITED

FOR THE YEARS ENDED DECEMBER 31, 1982 AND 1981

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The financial statements of the Corporation are prepared on the accrual basis of accounting, consistent with reporting for federal income tax purposes.

Property is recorded at cost. Depreciation is provided for on the straight-line method based upon the estimated useful lives of the assets. Assets acquired after January 1, 1981 are being depreciated according to the new accelerated cost recovery system, as defined in the Economic Recovery Tax Act of 1981.

NOTE B - LEASE AGREEMENTS

The Corporation leases revenue equipment on a monthly basis with rentals amounting to \$110,438 and \$84,650 for 1982 and 1981, respectively.

The Corporation also leases terminal facilities with rentals amounting to \$15,450 and \$8,050 for 1982 and 1981, respectively. This lease is for a period of 60 months.

NOTE C - COVENANT NOT TO COMPETE

On May 22, 1979, the Corporation entered into a covenant not to compete agreement with Vincent White for a total consideration of \$125,000. \$75,000 of this total was paid on May 22, 1979 with the balance of \$50,000 payable in two equal installments of \$25,000, due January 1, 1980 and January 1, 1981. These payments are without interest. The January 1, 1980 payment was made on December 28, 1979 and the January 1, 1981 payment was made on December 29, 1980. This agreement is being amortized over thirty-six months.

NOTE D - NOTES PAYABLE

The debt due Martera, Inc. is subject to interest at 8% for 1983.

	<u>1982</u>		<u>1981</u>	
	<u>Current</u>	<u>Long-Term</u>	<u>Current</u>	<u>Long-Term</u>
Martera, Inc.	<u>\$ 14,336</u>	<u>\$ 28,676</u>	<u>\$ 40,000</u>	<u>\$ None</u>
<u>Total</u>	<u>\$ 14,336</u>	<u>\$ 28,676</u>	<u>\$ 40,000</u>	<u>\$ None</u>

PITT-OHIO EXPRESS, INC.

NOTES TO FINANCIAL STATEMENTS - UNAUDITED

FOR THE YEARS ENDED DECEMBER 31, 1982 AND 1981

NOTE E - AMORTIZATION OF ORGANIZATIONAL EXPENSES

Pursuant to regulation 1.248-1(c), the Corporation elects to amortize organizational expenses over a sixty-month period beginning with May 1, 1979. Organizational expenses amounted to \$1,173.

NOTE F - FRANCHISES

The Corporation is writing off the cost of the Interstate Commerce Commission operating rights resulting from the enactment of the Motor Carrier Act of 1980 and the deregulation of motor carriers. This is being done over a sixty-month period beginning with July 1, 1980.

See Accountants' Review Report.

III. VERIFIED STATEMENT OF JOHN W. PINCHOT
FOR HEINZ USA DIVISION, H. J. HEINZ COMPANY

1. Legal Name and Domicile of Supporting Company.

Heinz USA Division, H. J. Heinz Company has its main offices at 1062 Progress Street, Pittsburgh, PA 15212.

2. Identity and Qualifications of Witness.

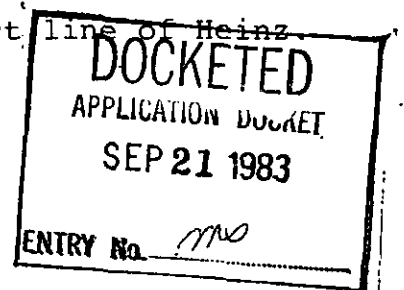
My name is John W. Pinchot. My business address is 1062 Progress Street, Pittsburgh, PA 15212. I am the Manager, Transportation Planning for Heinz. I have been employed by the company for 17 years and have held my present position for ten years.

As Manager of Transportation Planning it is my responsibility to oversee the integration of the Heinz USA transportation system in order to meet inventory and customer service requirements at a reasonable cost to the company. In order to accomplish these aims it is my function, when necessary, to support motor carriers for operating authority.

I have been authorized to submit this verified statement in support of the application of Pitt-Ohio Express, Inc. at Docket No. A. 102471, Folder 1, Am-C.

3. General Description of Company.

Heinz is a manufacturer of canned and preserved food products such as ketchup, pickles, baby food, private label soups and private label baby foods. Attached to my statement as Appendix 1 is a list of the complete product line of Heinz.



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Within Pennsylvania Heinz has three pertinent facilities. It has a manufacturing plant in Pittsburgh at 1062 Progress Street. This facility manufactures many of the products set forth on Appendix 1. In Pittsburgh at 1600 West Carson Street Heinz has a Customer Service Center which is a full line warehouse facility that handles all of the products manufactured or distributed by Heinz.

It also has a Customer Service Center located at 300 West Heinz Street, Mechanicsburg, PA.

The Pittsburgh Customer Service Center is a warehouse containing approximately 250,000 square feet of storage space. The Mechanicsburg Customer Service Center is a similar type facility which serves the central and eastern portion of Pennsylvania.

The Pittsburgh plant ships from 6:30 a.m. to 2:30 p.m., and receives inbound freight from Noon to 10:00 p.m. The Pittsburgh Customer Service Center ships from 8:30 a.m. to 2:30 p.m. The Mechanicsburg Customer Service Center ships from 7:00 a.m. to 3:30 p.m.

There are 30 loading and 15 unloading doors at the Pittsburgh plant, 26 doors at the Pittsburgh Customer Service Center, and 28 doors at the Mechanicsburg Customer Service Center.

In addition to making outbound shipments of the commodities shown on Appendix 1, the Pittsburgh plant receives inbound shipments from other points in Pennsylvania of salt, sugar and bottle caps.

4. Volume and Frequency of Intended Use.

Upon approval of this application, the applicant will be tendered at least 40,000 pounds of freight each week. This is a minimum volume figure and could fluctuate drastically as a result of the large volume of freight which Heinz has moving between points in Pennsylvania, as described in greater detail in the next section of this statement.

5. Specific or Representative Origins and Destinations.

The outbound traffic from our three Pennsylvania facilities ranges from LTL shipments in the 2,500 pound-19,000 pound range to volume or truckload shipments weighing between 20,000 pounds and 42,000 pounds. Approximately 93% of the total outbound traffic is moved in lots of 40,000 pounds or more. These shipments move to grocery store chains and distributors as well as food service customers such as restaurant chains and suppliers.

There is attached to my statement as Appendix 2 a list of representative points in Pennsylvania to which our three facilities make shipments. Also shown on Appendix 2 are the annual number of truckloads to each point and the approximate total volume to each point in pounds.

As shown by Appendix 2, the Pittsburgh manufacturing plant ships to customers throughout the state including a sizable volume of traffic to the Mechanicsburg Customer Service Center. The total volume from the manufacturing plant consists of approximately 1,356 truckloads which weigh in excess of 57,000,000 pounds.

The Pittsburgh Customer Service Center ships to points throughout western Pennsylvania and its annual volume is approximately 300 truckloads weighing a cumulative 12,500,000 pounds.

The Mechanicsburg Customer Service Center, which I previously indicated serves primarily the eastern part of Pennsylvania, annually makes approximately 800 truckloads weighing a total of approximately 32,000,000 pounds.

The total outbound volume from these three facilities to points in Pennsylvania is therefore in excess of 100,000,000 pounds a year. Heinz would have no difficulty in tendering to the applicant at least 40,000 pounds of freight each week.

The inbound shipments to Pittsburgh are all truckload shipments weighing between 40,000 and 43,000 pounds each. Inbound traffic amounts to approximately 15 truckloads and 649,000 pounds of salt each year from Clarks Summit; about 42,000 pounds of sugar each year from Philadelphia; and approximately 47 truckloads of bottle caps weighing 1,900,000 pounds annually from Hazelton.

6. Type of Service Required.

It is critically important that Heinz have overnight delivery service in order to meet the requirements of its customers. Heinz' normal distribution pattern involves a call to a carrier on one day, for pickup the next day, with delivery on the third day. Carriers therefore are normally given up to 24 hours advance notice of when shipments will be available to them. They are scheduled in for deliveries and are expected to call the customer for an appointment

before attempting delivery. But in any event, the time in transit from the time of pickup to the time of delivery is expected to be on an overnight basis. Because of the large volume of traffic Heinz ships and receives daily it is essential that carriers provide a scheduled pickup service. And because of the necessity of making appointments with customers, a scheduled delivery service is required.

Heinz has a pool truck pricing program in effect which makes multiple stop-off delivery service a daily requirement, particularly in connection with the two Customer Service Centers. These two service centers build loads for multiple stop-off deliveries whenever there are reasonably compatible combinations of destinations involved at the same time.

To a somewhat lesser extent, split pickup service is used in connection with the Pittsburgh area plant and Customer Service Center.

Between October 15 and April 15 equipment must be provided by a motor carrier which is capable of protecting many of the products from freezing.

7. Similar Applications Supported.

Approximately 11 months ago Heinz supported an intra-state application filed by Hammel's Express, Inc. at Docket No. A. 88995, Folder 2, Am-F which sought authority to transport property insofar as Heinz is concerned from the two Pittsburgh area facilities to points in Pennsylvania on and east of U. S. Highway 15, and vice versa. It is

my understanding that the Hammel's application is awaiting an initial decision by the Administrative Law Judge assigned to the case and that that application proceeding may not be concluded for some time.

APPENDIX 1

DETAILED LIST OF THE PRODUCT VARIETIES
MANUFACTURED AND MARKETED BY THE
H. J. HEINZ COMPANY

BABY FOOD

Applesauce
Applesauce and Apricots
Apples and Cranberries
Apples and Pears
Apricots w/Tapioca
Bananas & Pineapple
Banana Pudding
Bananas w/Tapioca
Beef and Beef Broth
Beef and Egg Noodles
Beef w/Vegetables
Beets
Carrots
Cereal and Eggs
Cereal, Egg Yolks & Bacon
Chicken and Chicken Broth
Chicken Noodle Dinner
Chicken Soup
Chicken w/Vegetables
Cottage Cheese w/Bananas
Creamed Chicken
Creamed Corn
Creamed Peas
Creamed Spinach
Custard Pudding
Egg Noodles & Beef
Egg Yolks
Fruit Dessert
Green Beans
Ham w/Vegetables
Lamb and Lamb Broth
Liver and Liver Broth
Macaroni, Tomatoes, Beef & Bacon
Mixed Cereal w/Apples & Bananas
Mixed Vegetables
Oatmeal Cereal w/Apples & Bananas
Peaches
Peach Cobbler
Pears
Pears & Pineapple
Pineapple Orange Dessert
Plums w/Tapioca
Pork and Pork Broth
Prunes w/Tapioca
Rice Cereal w/Apples & Bananas

DETAILED LIST OF THE PRODUCT VARIETIES
MANUFACTURED AND MARKETED BY THE
H. J. HEINZ COMPANY

BABY FOOD(cont'd)

Spaghetti, Tomato Sauce & Meat
Split Peas, Vegetable & Bacon
Squash
Sweet Potatoes
Turkey Rice Dinner w/Vegetables
Turkey w/Vegetables
Tutti Frutti
Veal and Veal Broth
Veal w/Vegetables
Vegetables & Bacon
Vegetables & Beef
Vegetables & Ham
Vegetables & Lamb
Vegetables, Egg Noodles & Chicken
Vegetables, Egg Noodles & Turkey
Vegetables w/Dumplings, Beef & Bacon

JUICE(Strained)

Apple
Apple - Apricot
Apple - Cherry
Apple - Grape
Apple - Pineapple
Apple - Prune
Mixed Fruit
Orange - Apple - Banana
Orange

INSTANT CEREAL

Barley
High Protein Cereal
Mixed Cereal
Oatmeal
Rice

BEANS

Beans in Molasses Sauce
Beans & Franks
Beans in BBQ Sauce
Pork 'N/Tomato Sauce(8 oz.)
Vegetarian(8 Oz.)
Pork 'N/Tomato Sauce (16 oz.)
Vegetarian(16 oz.)

DETAILED LIST OF THE PRODUCT VARIETIES
MANUFACTURED AND MARKETED BY THE
H. J. HEINZ COMPANY

BLENND FRUIT DRINK & CONCENTRATE

Combo Fruit Flavor Drink Concentrate
Orange Flavor Drink Concentrate
Orange/Lemon Flavor Drink Concentrate

ENTREES

Beans in Molasses Sauce
Beans in BBQ Sauce
Beans & Franks
Beef Goulash
Beef Stew
Chicken Stew w/Dumplings
Chili Con Carne
Chili & Macaroni in Meat Sauce
Macaroni & Beef in Tomato Sauce
Macaroni & Cheese
Noodles & Chicken
Noodles w/Beef & Sauce
Noodles & Tuna
Pork "N" Beans
Spaghetti w/Meat Sauce
Spaghetti in Tomato Sauce w/Cheese
Spanish Rice
Vegetarian Beans

FRUIT JUICE

Apple
Grape
Grapefruit(Unsweetened)
Orange(Unsweetened)
Pineapple
Prune
Tomato Juice(5½ oz.)
Tomato Juice(46 oz.)

GRAVY

Brown(12 oz.)
Brown(18 oz.)
Chicken(12 oz.)
Mushroom(12 oz.)
Onion(12 oz.)

DETAILED LIST OF THE PRODUCT VARIETIES
MANUFACTURED AND MARKETED BY THE
H. J. HEINZ COMPANY

KETCHUP/CHILI SAUCE

Chili Sauce(12 oz.)
Chili Sauce #10
Ketchup(1/3 oz.)
Ketchup(12 oz. Widemouth)
Ketchup(14 oz. Hot Ketchup)
Ketchup(14 oz.)
Ketchup(16 oz.)
Ketchup(20 oz. Family Size)
Ketchup(24 oz.)
Ketchup(26 oz. Ketchup Lover)
Ketchup(32 oz. Keg '0' Ketchup)
Ketchup #10
Ketchup(Volume Pack 3 gal.)

MINUTE MEALS(Individual EZO)

Beans & Franks
Beef Goulash
Beef Stew
Chicken Stew w/Dumplings
Chili & Macaroni in Sauce
Chili Con Carne w/Beans
Hot Chili Con Carne
Macaroni & Beef in Tomato Sauce
Macaroni & Cheese
Noodles w/Beef & Sauce
Noodles 'N' Chicken Dinner
Noodles & Tuna
Spaghetti w/Meat Sauce
Spaghetti in Tomato Sauce w/Cheese
Spanish Rice

MUSTARD

Brown(6 oz.)
Brown(9 oz.)
Mild(6 oz.)
Mild(9 oz.)
Mild(24 oz.)
Pourable Mild(8 oz.)
Salad Style(Gal.)
Single Serve($\frac{1}{2}$ oz.)
Spicy Brown(6 oz.)
Spicy Brown(9 oz.)
Spicy Brown(24 oz.)

DETAILED LIST OF THE PRODUCT VARIETIES
MANUFACTURED AND MARKETED BY THE
H. J. HEINZ COMPANY

NUTRITION PRODUCTS

Apple Snacks
Bouillon
Cooking Spray
Sweetener
Dry Powdered Drink Mix

PEPPERS

Hot Cherry(16 oz.)
Hot Cherry(32 oz.)
Hot Cherry(Gal.)
Hot Cherry Sliced(Gal.)
Hot Sliced(16 oz.)
Mild(32 oz.)
Sweet Cherry(16 oz.)
Sweet Cherry(Gal.)
Sweet Mementos(16 oz.)

PICKLES

Sweet Gherkins(8 oz.)
Sweet Mixed(8 oz.)
Sweet Midget Gherkins(8 oz.)
Sweet Onions(8 oz.)
Spiced Onions(8 oz.)
Baby Kosher Dills(16 oz.)
Bread 'N' Butter Slices(16 oz.)
Dills(16 oz.)
Dill Gherkins(16 oz.)
Hamburger Dill Slices(16 oz.)
Kosher Dill Spears(16 oz.)
Kosher Dill Gherkins(16 oz.)
Sweet Gherkins(16 oz.)
Sweet Mixed(16 oz.)
Sweet Cucumber Stix(16 oz.)
Sweet Cucumber Slices(16 oz.)
Sweet Pickles(16 oz.)
Sweet Salad Cubes(16 oz.)
Sweet Slices(16 oz.)
Baby Kosher Dills(24 oz.)
Bread 'N' Butter Slices(24 oz.)
Deli Style Dill Pickle Halves(24 oz.)
Hot Mixed(24 oz.)
Kosher Dill Spears(24 oz.)
Polish Style Dill Spears(24 oz.)
Sweet Pickles(24 oz.)
Sweet Mixed(24 oz.)

DETAILED LIST OF THE PRODUCT VARIETIES
MANUFACTURED AND MARKETED BY THE
H. J. HEINZ COMPANY

PICKLES(cont'd.)

Dills(32 oz.)
Genuine Dills(32 oz.)
Hamburger Dill Slices(32 oz.)
Kosher Dills(32 oz.)
Kosher Dill Slices(32 oz.)
Polish Style Dills(32 oz.)
Sweet Cucumber Slices(32 oz.)
Dills(46 oz.)
Genuine Dills(46 oz.)
Hamburger Dill Slices(46 oz.)
Kosher Dill(46 oz.)
Polish Style Dills(46 oz.)
Sweet Cucumber Slices(46 oz.)
Fresh Pack Cucumber Pickle Slices #10
Fresh Pack Dill Pickle Slices #10
Fresh Pack Kosher Dill Pickle Spears #10
Fresh Pack Hamburger Dill Slices 1/8" #10
Fresh Pack Large Whole Kosher Dill Pickles #10
Fresh Pack Bread 'N' Butter Cucumber Chips #10
Fresh Pack Small Whole Kosher Dill Pickles #10
Fresh Pack Thick Kosher Dill Slices #10
Fresh Pack Thin Kosher Dill Slices #10
Hamburger Pickle Slices #10
Large Whole Genuine Dill #10
Spiced Pickle Chips #10
Sweet Gherkins #10
Kosher Dill Spears #10
Sweet Mixed #10
Sweet Pickle Slices #10
Fresh Pack Large Kosher Dill Pickle Spears #10
Kosher Dill Pickles(Gal.)
Kosher Dill Chips(Gal.)
Processed Hamburger Dill Pickle Slices(Gal.)
Processed Sweet Mixed Pickles(Gal.)
Processed Sweet Mild Gherkins(Gal.)
Processed Sweet Pickle Slices(Gal.)
Processed Sweet Gherkins(Gal.)
Colonial Label Hamburger Dills(5 Gal.)
Cross Cut Dill Chips(5 Gal.)
Cross Cut Hamburger Dill Chips(5 Gal.)
Hamburger Dill Slices(5 Gal.)
Hamburger Dill Pickle Slices(5 Gal.)
Spiced Pickle Chips(5 Gal.)

DETAILED LIST OF THE PRODUCT VARIETIES
MANUFACTURED AND MARKETED BY THE
H. J. HEINZ COMPANY

PUREED FOODS

Applesauce
Apricots w/Tapioca
Beef w/Broth
Beets
Carrots
Chicken w/Broth
Green Beans
Lamb w/Broth
Liver w/Broth
Peas
Peaches
Pears
Squash
Spinach
Turkey w/Broth
Veal w/Broth

RELISHES

Corn(10 oz.)
Hamburger(10 oz.)
Hot Dog(10 oz.)
India(10 oz.)
Piccalilli(10 oz.)
Sweet(10 oz.)
Sweet Party(10 oz.)
Sweet(15 3/4 oz.)
Corn #10
Dill #10
Hamburger #10
Sweet #10
Processed Sweet Pickle Relish(Gal.)

SALES AGENCIES

Croutons
Edible Nuts
Springhouse Water

SAUCES

Basic Brown Sauce(10½ oz.)
Basic Cheese Sauce(10½ oz.)
Basic Italian Sauce(10½ oz.)
Basic White Sauce(10½ oz.)
BBQ Sauce(16 oz.)
BBQ Sauce w/Onions(16 oz.)
BBQ Sauce - Hickory Smoked(16 oz.)
BBQ Sauce w/Mushrooms(16 oz.)

DETAILED LIST OF THE PRODUCT VARIETIES
MANUFACTURED AND MARKETED BY THE
H. J. HEINZ COMPANY

SAUCES(cont'd.)

Hot BBQ Sauce(16 oz.)
BBQ Sauce w/Onions(26 oz.)
57 Sauce(5 oz.)
57 Sauce(10 oz.)
57 Sauce(15 oz.)
Savory Sauce(10½ oz.)
Worcestershire Sauce(5 oz.)
Worcestershire Sauce(10 oz.)

CONDENSED SOUPS(R.P.)

Bean
Beef Consomme
Beef Noodle
Beef Vegetable
Chicken Consomme
Chicken Gumbo
Chicken Noodle
Chicken Rice
Chicken Vegetable
Clam Chowder/Manhattan
Clam Chowder/New England
Cream of Asparagus
Cream of Celery
Cream of Chicken
Cream of Green Pea
Cream of Mushroom
Cream of Tomato
French Style Onion
Minestrone
Split Pea
Tomato
Tomato Rice
Turkey Noodle
Vegetable
Vegetable Beef
Vegetarian Vegetable
"Kitchen Mate" Vegetable w/Beef
Bonanza Chuck Wagon

INDIVIDUAL SOUPS(Easy Open)

Bean
Beef Noodle
Chicken Noodle
Chicken Rice
Cream of Mushroom
Cream of Tomato
Minestrone
Split Pea
Vegetable
Vegetable Beef

DETAILED LIST OF THE PRODUCT VARIETIES
MANUFACTURED AND MARKETED BY THE
H. J. HEINZ COMPANY

TOMATO PRODUCTS

Tomato Paste #10
Tomato Puree #10
Tomato Sauce #10

HEINZ TUNA

Light Tuna in Water(13 oz.)
Light Tuna in Water(66½ oz.)
White Tuna in Water(13 oz.)
White Tuna in Water(66½ oz.)
Light Chunk Tuna in Water(66½ oz.)

VINEGAR

Garlic Wine(12 oz.)
Salad(12 oz.)
Tarragon(12 oz.)
Wine(12 oz.)
Malt(12 oz.)
Cider(Pints)
White(Pints)
Cider(Quarts)
White(Quarts)
Cider(½ Gal.)
White(½ Gal.)
Cider(Gal.)
White(Gal.)
Wine(Gal.)
Tarragon(Gal.)

APPENDIX 2

ANNUAL OUTBOUND VOLUME TO REPRESENTATIVE DESTINATIONS

	<u>Annual Truckloads</u>	<u>Approximate Volume</u>
1. <u>Pittsburgh Factory:</u>		
Shiremanstown	35	1,400,000#
Robesonia	17	680,000
Harrisburg	9	360,000
Scranton	17	680,000
Huntingdon	29	1,160,000
Forty-Fort	17	680,000
Philadelphia	76	3,040,000
Temple	9	360,000
Mechanicsburg CSC	<u>1,147</u>	<u>49,321,000</u>
	1,356	57,681,000#
2. <u>Pittsburgh CSC:</u>		
Bedford	14	560,000#
Altoona	20	800,000
Johnstown	6	240,000
DuBois	6	240,000
Erie	14	560,000
Punxsatawney	20	800,000
New Castle	6	240,000
Sharon	54	2,160,000
Mechanicsburg CSC	<u>161</u>	<u>6,923,000</u>
	301	12,523,000#
3. <u>Mechanicsburg CSC:</u>		
Reading	16	640,000#
Mechanicsburg	124	4,960,000
Shiremanstown	54	2,160,000
Harrisburg	8	320,000
Scranton	132	5,280,000
Allentown	31	1,240,000
Stroudsburg	8	320,000
Philadelphia	403	16,120,000
Pittsburgh CSC	<u>22</u>	<u>880,000</u>
	798	31,920,000#

IV. CONCLUSION

For the reasons set forth in the foregoing verified statements submitted in support of the application, Pitt-Ohio Express, Inc. respectfully requests that the Commission grant the application in its entirety.

Respectfully submitted,

William J. Lavelle

William J. Lavelle
Attorney for
PITT-OHIO EXPRESS, INC.,
Applicant

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

Due Date: September 21, 1983



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

September 21, 1983

IN REPLY PLEASE
REFER TO OUR FILE

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

In re: A-00102471, F. 1, Am-C - Application of Pitt-Ohio Express, Inc.

Dear Mr. Lavelle:

We have received the verified statements filed in the
above referenced proceeding.

The record will be reviewed and will be put before the
Commission for its decision. You will be notified of the Commission's
action.

Very truly yours,

By Tim Zeigler
For Peter S. Marzolf, Chief
Technical Review Section
Bureau of Non-Rail Transportation

1104
DOCUMENT

DOCKETED
APPLICATION DOCKET
SEP 21 1983
ENTRY No. *ms*