

Applicant Ex. No. 11

A. 105101

10/8/84

Plaka, PD

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Before The

PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF : DOCKET NO.  
J. F. LOMMA, INC. : A. 00105101

**DOCKETED**  
NOV 7 - 1984

PREPARED TESTIMONY OF  
VINCENT G. GUINTO  
WESTINGHOUSE ELECTRIC CORPORATION

**RECEIVED**

OCT 31 1984

SECRETARY'S OFFICE  
Public Utility Commission

**DOCUMENT  
FOLDER**

- Q. Please identify yourself and state your business address.**
- A. My name is Vincent G. Guinto and my business address is Post Office Box K, 700 Braddock Avenue, East Pittsburgh, Pennsylvania 15112.
- Q. By whom are you employed and in what capacity?**
- A. I am employed by Westinghouse Electric Corporation as the Manager of Traffic, Shipping and Receiving for the large rotating apparatus ("LRA") plant. I am responsible for all of the transportation requirements of Westinghouse's East Pittsburgh facility.
- Q. Are you authorized to appear in this proceeding and give testimony in support of the application of J. F. Lomma, Inc.?**
- A. Yes.
- Q. What is the business of Westinghouse Electric Corporation?**
- A. As it pertains to our support for this application, we are a manufacturer of electrical generators. I am involved with the Power Generation Operations Division of Westinghouse Electric, and our East Pittsburgh facility is referred to as the large rotating apparatus plant. This facility manufactures heavy machinery which is shipped to points throughout the world. Annual sales volume for the East Pittsburgh facility is approximately \$150 million. Westinghouse Electric utilizes the services of 1500 employees at the facility involved in this application.
- Q. What type of commodities do you ship to or receive from points in Pennsylvania?**
- A. On an outbound basis, we ship the following commodities: turbine generators, turbine generator rotors, turbine generator stators, electric motors and reactor coolant pump motors. All of these commodities require either special handling or special equipment.

On an inbound basis, we receive used generators, rotors, stators and motors.

**Q Please indicate your volume of heavy hauling traffic.**

- A. Westinghouse Electric has between 10 and 20 heavy hauling shipments per month moving from its East Pittsburgh facility on an outbound basis. Of these, up to 6 shipments per month would be destined to a Pennsylvania point. Our average heavy hauling shipment weighs approximately 70,000 pounds, with average monthly volume to Pennsylvania points averaging 200,000 pounds per month. However, our component parts can weigh as much as 1 million pounds per unit.

Inbound shipments moving to our facility average 6 per month, with 2 originating in Pennsylvania. Approximate total inbound tonnage from Pennsylvania points would be approximately 200,000 pounds per month.

**Q. Please identify the principal Pennsylvania origins and destinations of your heavy hauling traffic.**

- A. We ship to, and receive from, various electric utility job-sites within Pennsylvania. In addition, we ship to other major users of power such as pulp mills, paper mills and industrial complexes. Specific examples of past destinations include Lester, Pennsylvania and Philadelphia, Pennsylvania.

The destinations of our traffic also serve as origins of inbound movements. We often have our products move back to our East Pittsburgh facility for repairs. Once the repairs are completed, the product is returned to its original destination.

We also have inbound movements of raw materials utilized in manufacturing our finished products. Inbound commodities such as forgings would require special equipment for their proper handling. Commodities moving on an inbound basis would originate at the facilities of such companies as U.S. Steel and Bethlehem Steel.

**Q. What type of special equipment do you require?**

- A. We require any type of special equipment that can transport our products in a safe and efficient manner. These include low-boy trailers, double-drop trailers and multi-wheeled vehicles. The products that we ship can be over-dimensional in terms of height, width, length or weight. Consequently, our practice is to inform the carrier of the dimensions and weight of the particular item for which we require transportation. We then allow the carrier to select the particular type of special equipment to be utilized based upon the weight and dimensions of the item to be transported.

**Q. Please indicate why Westinghouse Electric is supporting the application of J. F. Lomma, Inc.**

- A. We have experienced some difficulty in acquiring the type of equipment that we require to safely move our products. Also, we have found that some carriers possess incomplete authority and are therefore unable to meet all of our service needs. The approval of this application as applied for will insure

the availability of additional equipment to Westinghouse, as well as affording J. F. Lomma, Inc. the broad geographical coverage necessary to satisfy all of our intrastate heavy hauling requirements.

Before The

A. 105101

PENNSYLVANIA PUBLIC UTILITY COMMISSION

10/9/84

APPLICATION OF  
J. F. LOMMA, INC.

:  
:

DOCKET NO.  
A. 00105101

Phila, PA

RJS

**DOCKETED**  
NOV 7 - 1984

PREPARED TESTIMONY OF  
CHARLES W. RHINIER  
SCHRAMM, INC.  
PNEUMATIC ELECTRIC AND EQUIPMENT COMPANY

**RECEIVED**

OCT 31 1984

SECRETARY'S OFFICE  
Public Utility Commission

**DOCUMENT**  
**FOLDER**

**Q. Please identify yourself and state your business address.**

A. My name is Charles W. Rhinier and my business address is 800 East Virginia Avenue, West Chester, Pennsylvania 19380.

**Q. By whom are you employed and in what capacity?**

A. I am the Manager - Traffic, Shipping and Packaging of Schramm, Inc. It is my responsibility to arrange for the movement of our products to and from both interstate and intrastate points.

I am also the Traffic Manager of Pneumatic Electric and Equipment Company ("PEECO"). I am responsible for arranging for all of the motor carrier transportation required by PEECO.

**Q. Are you authorized to appear and present evidence in this proceeding on behalf of both Schramm and PEECO?**

A. Yes.

**Q. Please describe the businesses of Schramm, Inc. and PEECO.**

A. Schramm is engaged in the manufacture of heavy drilling equipment, portable, stationary and high-pressure air compressors, and pneumatractors. Schramm distributes its products to a network of dealers and distributors. Its sales volume for 1983 approximated \$14 million. Schramm employs the services of approximately 200 employees at its West Chester facility. That facility includes assembly, fabrication, machine shop, storage and packaging buildings spread over approximately 40 acres.

PEECO is a sales and service organization that is a wholly-owned subsidiary of Schramm. PEECO is involved in selling the products manufactured by Schramm. PEECO's sales territory includes the states of Pennsylvania, New Jersey, Delaware, New York and Virginia.

**Q. Please identify the specific commodities for which you require service.**

A. We require transportation of air compressors, and parts therefore, portable drilling equipment, parts and accessories, drill pipe for water well drilling and portable tractors with back hoes. Our portable drills, portable tractors and high-pressure air compressors are all heavy, bulky items, with a single tractor weighing as much as 15,000 pounds and a single compressor weighing between 12,000 and 18,000 pounds. The drills, tractors and compressors all require the use of special handling or special equipment.

Attached hereto as Appendix 1 is a brief description of some of the products which we produce and for which we require transportation services.

**Q Please indicate your volume of heavy hauling traffic.**

A. Out of a total of 5 to 10 outbound shipments per month, 2 to 5 heavy hauling shipments move to Pennsylvania points. Our average monthly total tonnage is 219,616 pounds, with tonnage to Pennsylvania points being 164,712 pounds per month.

**Q. Please identify some Pennsylvania points to which you have made heavy hauling shipments in the past.**

A. As indicated above, we sell our products through a network of dealers and distributors and therefore require service to their facilities on a regular basis. Also, Schramm dealers and PEECO have a need for delivery service directly to their customers. Schramm and PEECO customers can be situated at any point in Pennsylvania. We are therefore fully supporting J. F. Lomma for statewide authority.

Some representative destinations of past heavy hauling shipments include Clearfield, Oil City, Uniontown, Harrisburg, Downingtown and West Chester.

We do not have any Pennsylvania origins for heavy hauling traffic moving inbound to our West Chester facility.

**Q. Please indicate the type of special equipment that you require.**

A. We require detachable, goose-neck low-boy trailers, particularly in connection with movements to customer job-site locations. We also require drop-deck stretch trailers. Drop-deck trailers are required for handling our portable tractors which can be as high as 108 inches. It is our understanding that Lomma has the type of equipment that we require.

**Q. Please indicate the basis of your support for the application of J. F. Lomma, Inc.**

A. We believe that there is a definite need for an additional carrier to handle the type of traffic for which we require transportation. The authorization of J. F. Lomma, Inc. in Pennsylvania will help insure the availability of the special type of equipment that we require, when we require it. Consequently, we strongly urge the approval of this application.



# CRAWLER MOUNTED ROTADRILLS

**Series "S"** — These rigs are equipped with air compressors that deliver 100 psi (7 kg/cm<sup>2</sup>) standard operating pressure. Included are Models C42-C, C66-C and C9120. These rigs are designed for fast drilling with drag or tricone bits as well as 100 psi (7 kg/cm<sup>2</sup>) bottom hole hammers.

**Series "H"** — Fitted with Schramm Hi-Pressure compressors, the units provide air at 250 psi (17.6 kg/cm<sup>2</sup>). The series includes Models C42H-C, C64H-C and C985H. They are designed for rapid penetration of hard, abrasive formations with the latest high-pressure percussion tools.

**C42H-C**  
250 cfm @ 250 psi —  
14,700 lbs. Pulldown

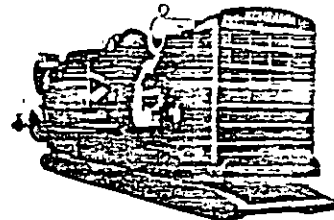
**C42-C**  
300 cfm @ 100 psi —  
14,700 lbs. Pulldown

These machines offer users a compact rig with more outstanding engineering features than are available with any competitively priced unit. Lazy Susan pipe rack, top head drive, breakout jaws, outriggers and all rig functions are hydraulically operated. Maximum hole size is 5<sup>5</sup>/<sub>8</sub>" (143 mm) for rotary drilling and 5" (127 mm) for percussion tool.

## HI-PRESSURE AIR COMPRESSORS

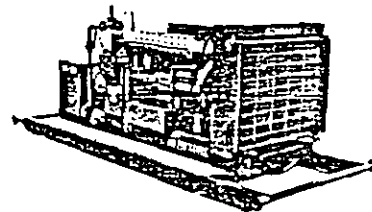
To supply auxiliary air for drilling operations, Schramm offers two high pressure compressors, both of which deliver air at 350 psi (24.5 kg/cm<sup>2</sup>). Both are mounted on oil field skids. These compressors are built and engineered for continuous heavy duty operation.

### MODEL 425/350

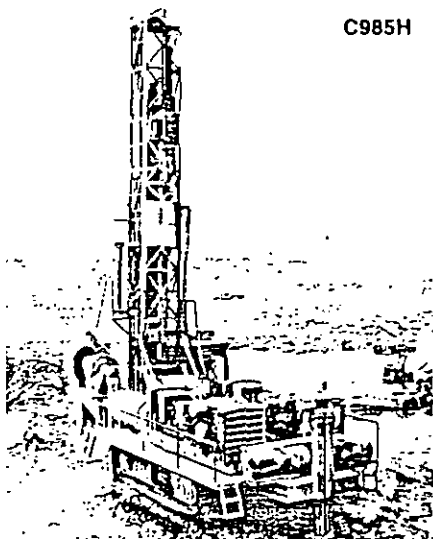


The Schramm 425/350, supercharged two-stage reciprocating Hi-Pressure Air Compressor is a dependable source of high pressure air, with large volume and maximum availability. Powered by an 8V71 Detroit Diesel engine, and equipped with a large cooling unit, the compressor will deliver 425 cfm @ 350 psi continuously under the most extreme weather conditions. The Model 425/350 is at its best in the heavy construction industry . . . in pile driving . . . in the oil fields . . . and, it's first choice for use on off shore drilling platforms. Dual-pressure, a standard feature, provides two machines in one (low pressure range up to 125 psi).

### MODEL 850/350



This unit supplies 850 cfm @ 350 psi (23.8 m<sup>3</sup>/min. @ 24.5 kg/cm<sup>2</sup>). The two-stage oil-flooded rotary screw compressor is driven by an 8V-92T (turbocharged) Detroit Diesel. The fuel tank is sized for ten hours of continuous compressor operation. Unloading is controlled by a modulating valve system and a safety electrical circuit provides automatic shutdown in the event of high air discharge temp., high compressor inter-stage pressure, high engine coolant temperature, low engine oil pressure, low engine fuel pressure and low engine coolant level.



C985H

**C985H**  
850 cfm @ 250 psi —  
49,000 lbs. Pulldown

**C9120**  
1200 cfm @ 100 psi —  
49,000 lbs. Pulldown

These large Schramm Rotadrills are completely self-contained rigs, which have been engineered for larger diameter blast hole drilling operations.

All drilling and tramming operations are performed at the drill operator station inside a roomy, comfortable enclosed cab. Pipe handling is fully mechanized and includes power makeup and breakout. Hydraulically controlled and actuated jaws are used for pipe holding and breakout.

Maximum hole diameter for rotary drilling with the C9120 is 9" (228mm) and 7<sup>7</sup>/<sub>8</sub>" with the C985H. Maximum diameter for percussion tool operation is 9" (228mm).

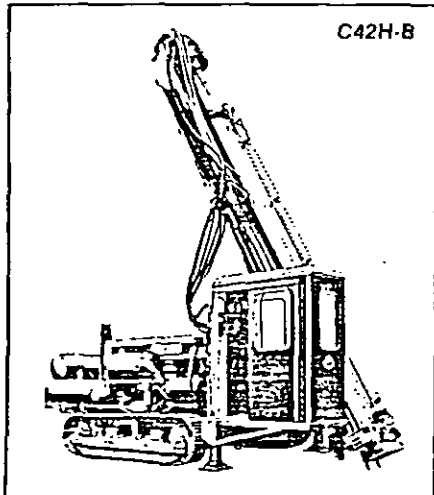
C985H & C9120 units include complete hydraulic operation for all drilling operations and rig functions. Rotafoam injection system and angle drilling are standard.

Models C42-C & C42H-C feature all-weather cab with centralized control and hydraulically operated pipe storage rack. Angle drilling is standard.

**C64H-C**  
425 cfm @ 250 psi —  
29,452 lbs. Pulldown

**C66-C**  
600 cfm @ 100 psi —  
29,452 lbs. Pulldown

Models C66-C and C64H-C are specifically designed for blast hole drilling in quarries, open pit mines and exploratory drilling operations. They feature Lazy Susan pipe storage within the mast, hydraulically operated breakout wrench and variable-speed top head rotation. Primary and secondary dust collection systems are standard. Maximum hole size for rotary drilling with the C66-C is 7<sup>7</sup>/<sub>8</sub>" (200 mm) and 8" (203.2 mm) for percussion tool. With the C64H-C, maximum hole size is 7" (177.8 mm) for both rotary and percussion.



C42H-B

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J. F. LOMMA, INC.

DOCUMENT  
FOLDER

DOCKET NO.  
A. 00105101

10/9/84

Mela, PA

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DOCKETED  
NOV 7 - 1984

PREPARED TESTIMONY OF  
J. R. AYLSWORTH  
SECO/WARWICK CORPORATION

RECEIVED

OCT 31 1984

SECRETARY'S OFFICE  
Public Utility Commission

- Q. Please state your name and business address.**
- A.** My name is J. R. Aylsworth and my business address is 180 Mercer Street, Meadville, Pennsylvania 16335.
- Q. By whom are you employed and in what capacity?**
- A.** I am employed by Seco/Warwick Corporation as its Traffic Manager. My responsibilities include the selection of motor carriers utilized by my company. I am familiar with my company's transportation requirements and with the application of J. F. Lomma, Inc. I am authorized to appear and testify on behalf of Seco/Warwick in this proceeding.
- Q. Please give a brief description of the business of Seco/Warwick.**
- A.** We are a manufacturer of industrial furnaces which are utilized in heat treating a variety of products. Our furnaces are utilized by such diverse companies as Caterpillar Tractors and Timex Watches as well as steel mills and aluminum mills.
- We maintain a fabricating facility located in Meadville, Pennsylvania. Annual sales of Seco/Warwick approximate \$20 million per year.
- We employ approximately 250 employees at our Meadville facility.
- Q. What type of commodities does Seco/Warwick ship to points within Pennsylvania?**
- A.** We ship industrial heat treating furnaces and aluminum holding furnaces, as well as parts for these products, from Meadville to points in Pennsylvania. Our furnaces are of the nature that they require special handling or special equipment for their proper transportation. For example, a single furnace can require 50 to 55 tractor-trailer movements for its complete transportation. Each of those movements would be of an

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over-dimensional component part that would require special equipment or special handling. Also, we have a case-master unit that measures 15 feet in height, 15 feet in width, is 30 - 40 feet in length and weighs between 100,000 and 120,000 pounds, and requires specialized equipment.

**Q. Please indicate the volume and frequency of your heavy hauler traffic.**

A. I would estimate our total outbound heavy hauler shipments, to approximate 20 per month, with 3 per month destined to Pennsylvania points. Our shipments average approximately 50,000 pounds each.

**Q. Please indicate some representative destinations of your traffic.**

A. With respect to movements to Pennsylvania points, we have had shipments to York, Philadelphia and Pittsburgh. These destinations are not indicative of all of our Pennsylvania traffic, but are merely representative of some points to which we have shipped in the past.

Seco/Warwick has sales representatives operating throughout the United States and throughout the Commonwealth of Pennsylvania. Any point at which a new manufacturing facility is being constructed is a potential destination for our traffic. Our traffic patterns are irregular, with shipments moving 10 miles from our Meadville facility one week and 300 miles the next. We are therefore fully supporting the statewide application of J. F. Lomma.

**Q. Does Seco/Warwick have any special transportation requirements?**

A. We have a distinct need for specialized transportation equipment. We require double-drop, single-drop, stretch double-drop, and stretch flatbed trailers. Also, because of the enormous weight of some of our products, and in order to comply with Pennsylvania bridging and axle weight laws, we require equipment with more than 5 axles. I am aware that Lomma has available each variety of equipment that we require.

In addition to specialized equipment, we also have special service requirements. We need job-site deliveries, as well as scheduled, date and time deliveries.

**Q. What carriers are presently utilized by Seco/Warwick?**

On an interstate basis, we are presently utilizing the services of International Transport, Tri-State Motor, Daniel Transfer and Hafer Trucking. Of these, Daniel Transfer is the only one which we are presently utilizing to points within Pennsylvania. However, Daniel Transfer does not have available the type of specialized equipment that we require. This forces us to break down our shipments into component parts, which is an unsatisfactory method of operating.

**Q. Why is Seco/Warwick supporting the application of J. F. Lomma, Inc.?**

A. It is our opinion that we do not have available to us the services of a satisfactory Pennsylvania intrastate specialized carrier. As a result of this, we have in the past been forced to ship component parts rather than

shipping a complete unit intact. We must then employ construction crews to erect the unit on site. The additional expenses incurred in employing construction crews has adversely affected the profitability of our company. In fact, Seco/Warwick has declined certain Pennsylvania business because of the absence of a satisfactory intrastate carrier and the resultant increased costs involved with erecting a unit that has been shipped piecemeal. Lomma would be utilized to carry a complete unit, thereby reducing our costs and enabling us to accept business that we have previously declined.

Another basis for our support is the termination of rail service. In the past, we relied heavily upon Conrail for our intrastate transportation needs. However, within the past twenty-four months Conrail's service has been almost totally non-existent. We therefore need Lomma to replace our prior rail service.

We believe that Lomma has the experience and the specialized equipment necessary to satisfy all of our intrastate transportation needs. We therefore strongly urge the approval of this application.

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

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APPLICATION OF  
J. F. LOMMA, INC.

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NOV 7 - 1984

PREPARED TESTIMONY OF  
EUGENE S. ACKERMAN  
H. H. ROBERTSON COMPANY

RECEIVED

OCT 31 1984

SECRETARY'S OFFICE  
Public Utility Commission

- Q. Please state your name and the identity of the company you represent.**
- A. My name is Eugene S. Ackerman and I am the Traffic Manager for H. H. Robertson Company - Ambridge Division. In my capacity as Traffic Manager, I am familiar with the transportation requirements of the Ambridge Division and am responsible for selecting the motor carriers utilized for service on both an inbound and outbound basis.
- My business address is H. H. Robertson Company, Ambridge Division, 14th Street, Ambridge, Pennsylvania, 15003.
- Q. Are you authorized to appear and present testimony on behalf of H. H. Robertson Company in this proceeding?**
- A. Yes.
- Q. Please give a brief description of the business of H. H. Robertson Company - Ambridge Division.**
- A. The Ambridge Division is engaged in the development, manufacture and erection of non-residential metal building products. We manufacture component parts such as floors and exterior walls that are combined on site to produce a finished building. Our products are utilized entirely for commercial purposes, including the erection of warehouses as well as floor systems for high-rise office buildings and hospitals.
- H. H. Robertson is a Fortune 500 Company. Annual sales from its Building Products Division alone (of which the Ambridge Division is a member) approximates \$600,000,000.
- H. H. Robertson maintains a manufacturing facility located on approximately 45 acres in Ambridge (Beaver County), Pennsylvania. At this facility, we utilize the services of approximately 450 employees - 325 on an hourly basis with the remaining 125 being salaried employees.

**Q. Please list the types of commodities you ship to or receive from Pennsylvania points.**

A. We ship a variety of products utilized in metal buildings, including entire sections of those buildings. The outbound shipments would include both plain and corrugated steel roofing, steel beams, steel sheets and building construction sections, together with accessories for the metal buildings. These products can range up to 45 feet in length. Inbound shipments from Pennsylvania points would involve steel coils moving in 45,000 pound truck load shipments.

**Q Please indicate the volume and frequency of your heavy hauling traffic.**

A. For the 34 weeks from January 1 to August 31, 1984, we had a total of 2,029 shipments moving outbound from our Ambridge facility. Of this total, 152 went to Pennsylvania points. Shipments moving to points in Pennsylvania had an average weight of 20,825 pounds. During the period in question, the average monthly volume to Pennsylvania points was 395,675 pounds.

For the same 34 week period, we had a total of 54 inbound shipments from Pennsylvania points out of 103 total inbound shipments. Total inbound tonnage for the period in question approximated 2,430,000 pounds.

H. H. Robertson Company pays the freight charges and routes the traffic moving both inbound to and outbound from its Ambridge facility.

**Q. Identify the principal origins and destinations of your traffic.**

A. The following is a brief listing of Pennsylvania points to which we have had heavy hauling shipments: Philadelphia, Pittsburgh, Reading, Allentown, Upper Merion, Horsham, Enon, Erie, Shippingport, University Park, Ebensburg, Altoona, Johnstown and Midland.

Our inbound shipments originate primarily at Irwin, Allenport and Fairless Hills, Pennsylvania.

**Q. In addition to requiring special equipment, does H. H. Robertson Company have any other special transportation requirements?**

A. We do require timed, scheduled deliveries. For example, we may require that a certain delivery be made at 8:00 a.m., a second delivery at 9:30 a.m., and a third delivery at 1:30 p.m. This is necessary in order to meet the construction schedules of the workers erecting the completed building. Also, because our products are utilized primarily in new construction, we require job-site deliveries. This is particularly true with respect to traffic moving to Pennsylvania points.

**Q. Please indicate for the record why H. H. Robertson Company is supporting this application.**

A. We have utilized the services of J. F. Lomma, Inc. on an interstate basis and have been well pleased with the service that it has supplied to us. We would very much like to have this carrier's availability to handle our Pennsylvania intrastate traffic, and therefore urge the approval of this application.

Before The

A. 105101

PENNSYLVANIA PUBLIC UTILITY COMMISSION

10/9/84

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APPLICATION OF : DOCKET NO.  
 J. F. LOMMA, INC. : A. 00105101

**DOCKETED**  
**NOV 7 - 1984**

PREPARED TESTIMONY OF  
 PAUL F. McCANN  
 PITTSBURGH - DES MOINES CORPORATION

**RECEIVED**

OCT 31 1984

SECRETARY'S OFFICE  
Public Utility Commission

**DOCUMENT  
 FOLDER**

**Q. Please state your name, the company you represent and your business address.**

**A.** My name is Paul F. McCann and I am testifying on behalf of Pittsburgh - Des Moines Corporation. My business address is 3400 Grand Avenue, Neville Island, Pittsburgh, Pennsylvania 15225.

**Q. What is your position with Pittsburgh - Des Moines?**

**A.** I am employed by Pittsburgh - Des Moines in the position of Traffic Manager. In that capacity I have daily contact with motor carriers and am totally familiar with my company's transportation requirements. I am authorized to appear in this proceeding and present testimony on behalf of Pittsburgh - Des Moines.

It is my responsibility for selecting the carriers utilized from our Neville Island facility. On occasion I also assist our Warren, Pennsylvania facility in selecting carriers when that facility encounters difficulty in arranging for suitable equipment.

**Q. Please briefly describe the business of Pittsburgh - Des Moines.**

**A.** Pittsburgh - Des Moines is a steel fabricator and erector. We maintain manufacturing facilities in Warren, Pennsylvania, Baltimore, Maryland, Des Moines, Iowa, Liberty, Texas, Provo, Utah, Casper, Wyoming, and Sacramento and Fresno, California. We also have a "toolhouse" situated in Neville Island, Pennsylvania, and have tentative plans to reopen our manufacturing facility at that location.

We not only manufacture steel products, but also supply the manpower necessary for erecting our products.

Pittsburgh - Des Moines utilizes the services of approximately 3,000 employees company-wide. Our annual sales volume approximates \$200 million.

**Q. Please identify the commodities you ship to or receive from points in Pennsylvania.**

A. We ship iron and steel items used on flat bottom cone roof tanks, flat bottom dome roof tanks, bridges, liquid natural gas tanks, spheres, elevated water storage tanks and construction equipment, as well as shipping entire tanks when their size permits their over-the-road transportation. Inbound shipments consist of steel plates, beams and angles, as well as girders used in building bridges.

**Q Please identify the volume of your heavy hauling traffic?**

A. Pittsburgh - Des Moines has 10 outbound shipments per month, with 4 of these moving to points within Pennsylvania. The average weight of an outbound heavy hauling shipment is 40,000 pounds.

Inbound shipments occur approximately 15 times per month. Of these, 5 originate at Pennsylvania points. Total inbound tonnage from Pennsylvania points averages 45 tons per month.

**Q. Identify the principal Pennsylvania origins and destinations of your heavy hauling shipments.**

A. Representative points within Pennsylvania to which we have had heavy hauling shipments include Shippingport, Neville Island, Warren, New Sewickley, Bradford, Elrama and Ardara. Pennsylvania origins of our inbound traffic include the following: Homestead, Bethlehem, Washington, Johnstown and Conshohocken.

**Q. Please identify the type of special equipment required by Pittsburgh - Des Moines.**

A. We require drop-deck trailers and double-drop trailers. Also, because we require deliveries to job-sites, we require equipment that is powerful enough to make deliveries of our heavy equipment at unpaved locations.

**Q. Does Pittsburgh - Des Moines have any special transportation needs?**

A. In addition to job-site deliveries, we require timed, scheduled deliveries. As indicated above, we not only manufacture the commodities in question but also erect them at their destination. It is very important that our deliveries arrive on time in order to keep the erection crews on schedule and in full operation. Late deliveries not only cause us construction delays but also result in additional expenses for Pittsburgh - Des Moines by causing us to pay our workers while they remain idle awaiting the arrival of an indispensable shipment.

**Q. Indicate why Pittsburgh - Des Moines is supporting the application of J. F. Lomma, Inc.**

A. We anticipate an increase in the amount of traffic that we will have moving between points in the application territory, particularly if our Neville Island manufacturing facility reopens as anticipated. The authorization of Lomma in this area will afford us greater access to heavy hauling service by making

available to us additional equipment and will help insure the timely,  
dependable service which we require.