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May 8, 1985

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

Re: Application of James D. Morrissey, Jr.
A-00104919

Dear Mr. Rich:

We have been advised of action taken by the Commission to dismiss the above-referenced application for non-filing of cargo insurance certificates form UCPC-31. Please consider this letter as our petition for reconsideration of this action, for the reasons set forth below:

We were advised by the Commission's compliance order to file the necessary tariff and cargo insurance certificates. The tariff was filed by our office. The applicant's insurance agent filed the cargo certificates. However, according to our conversation with Ms. Dorna Thorpe of our insurance department, the certificate was evidently filed under the old number for James D. Morrissey (A-00047868). It was of course intended that the insurance certificate be filed under the new application number, in compliance with the Commission's order.

There appears to be no question that the required insurance certificate was in fact filed; it was simply placed in the wrong file. We understand that Ms. Thorpe has arranged to file the certificate in the new file, under No. A-00104919.

While we regret any inconvenience caused to the Commission in this matter, we believe that every effort has been made by the

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**SECRETARY'S OFFICE
Public Utility Commission**

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Mr. Jerry Rich, Secretary
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applicant to conform to the Commission's compliance order, and that substantial compliance has been effectuated. We therefore request that the application of James D. Morrissey, Jr., No. A-00104919, be reinstated and approved.

Thank you for your consideration of this matter.

Very truly yours,


D. Rodman Eastburn

DRE/ht