

Law Offices

VUONO & GRAY, LLC

310 Grant Street, Suite 2310

Pittsburgh, PA 15219-2383

*John A. Vuono
William A. Gray
Mark T. Vuono*
Dennis J. Kusturiss
Louise R. Schrage
William H. Stewart, III
Erica G. Wilson*

**Also Admitted in Florida*

*Telephone
412-471-1800*

*Facsimile
412-471-4477*

www.vuonogray.com

*Email Address
wgray@vuonogray.com*

January 10, 2014

Re: Riverfront Moving & Storage, LLC
Docket No. A-2013-2388999

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

MAILED WITH U.S. POSTAL SERVICE
CERTIFICATE OF MAILING FORM 3817

Dear Ms. Chiavetta:

We enclose for filing with the Commission the signed original of a protest to the above 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 self-addressed stamped envelope provided.

Very truly yours,

VUONO & GRAY, LLC


William A. Gray

as/132607

Enclosure

cc: Christopher A. Hawthorne, Esq. (w/enc.)(By Certified Mail)

RECEIVED

JAN 10 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A-2013-2388999

RIVERFRONT MOVING & STORAGE, LLC

PROTEST AND REQUEST
FOR ORAL HEARING

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JAN 10 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

The motor carrier shown on Appendix A hereof (herein called protestant) protests the above application and requests that the application be assigned for oral hearing and in support thereof respectfully represents as follows:

1. By this application, notice of which has been published in the Pennsylvania Bulletin, applicant seeks authority as set forth in Appendix A.
2. Protestant holds authority from this Commission at the docket number shown in Appendix A and the relevant authority is attached to the protest. Unless otherwise indicated in Appendix A, protestant will withdraw the protest only in the event an amendment is made which will totally eliminate the interest of the protestant.

3. Approval of this application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since (a) protestant presently holds authority to provide service in the area affected by the application, (b) protestant and other existing carriers are providing adequate service to the public in the areas involved in the application, (c) there is no need for the service proposed by applicant and approval of the application will result in the diversion from existing carriers of revenue necessary to sustain their existing operations, (d) the applicant does not possess the technical and financial ability to provide the proposed service and lacks a propensity to operate safely and legally, and (e) approval of the application will adversely affect protestant and other existing carriers which have a substantial investment in facilities and equipment and are willing and able to provide service in the application area.

4. Protestant requests that the application be set for oral hearing and that applicant be required to prove by competent evidence the elements of proof required by statute. If an oral hearing is held, protestant will appear and present evidence in opposition to the grant of the application unless the application is amended so as to eliminate its interest as set forth in this protest.

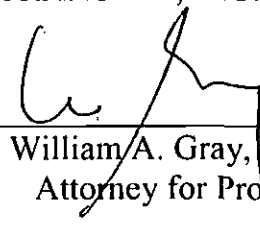
WHEREFORE, protestant requests that the granting of the application be withheld; the proceeding be assigned for oral hearing with leave to protestant to participate fully therein; and applicant be required to make available at the hearing

competent witnesses for examination on all material and relevant facts bearing on the application.

Respectfully submitted,

HOY TRANSFER, INC.

By:



William A. Gray, Esq.
Attorney for Protestant

VUONO & GRAY, LLC
310 Grant Street, Suite 2310
Pittsburgh, PA 15219-2383
(412) 471-1800

Dated: January 10, 2014

/132606

Re: Riverfront Moving & Storage, LLC
Docket No. A-2013-2388999

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APPENDIX A

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

SCOPE OF AUTHORITY SOUGHT:

By application published in the Pennsylvania Bulletin on January 4, 2014,
applicant seeks authority to operate as a common carrier, transporting:

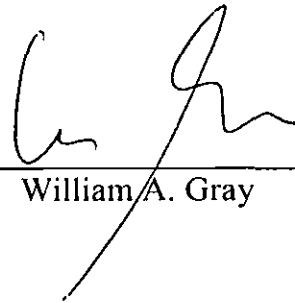
Household goods in use, from points in the Counties of Bucks
and Philadelphia, to points in Pennsylvania, and return.

INTEREST OF PROTESTANT:

Hoy Transfer, Inc., 2580 Clyde Avenue, State College, PA 16801 (800-257-1110)
holds operating authority at Docket No. A-00085095. A copy of the relevant authority of
Hoy Transfer is attached hereto. As relevant to this application, Hoy can provide service
from points in Bucks and Philadelphia Counties to points in Centre County and vice
versa. Hoy Transfer would withdraw its protest to this application if it were amended to
eliminate service to or from points in Centre County.

CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of January, 2014, served a copy of the above protest and request an oral hearing upon applicant or upon applicant's attorney or representative as shown in the Pennsylvania Bulletin notice.



A handwritten signature in black ink, appearing to read 'William A. Gray', is written over a horizontal line. The signature is stylized and cursive.

William A. Gray

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JAN 10 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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From: Vuono & Gray, LLC

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Pittsburgh, PA 15219-2383

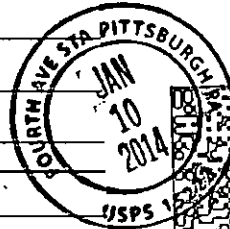
To: Rosemary Chiavetta, Secretary

Pennsylvania Public Utility Commission

P. O. Box 3265

Harrisburg, PA 17105-3265

PS Form **3817**, April 2007 PSN 7530-02-000-9065



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TO:

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
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Harrisburg, PA 17105-3265