

Law Offices

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February 4, 2014

Re: Gentle Giant Moving Company (DC), LLC
t/d/b/a Gentle Giant Moving & Storage
Docket No. A-2013-2393811

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

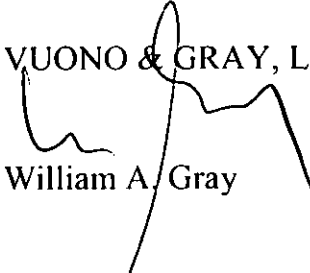
Dear Ms. Chiavetta:

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/133448

Enclosure

cc: Richard T. Mucahey, Jr., Esq. (w/enc.)(By Certified Mail)

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FEB - 5 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A-2013-2393811

GENTLE GIANT MOVING COMPANY (DC), LLC t/d/b/a
GENTLE GIANT MOVING & STORAGE

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PROTEST AND REQUEST
FOR ORAL HEARING

FEB - 5 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.

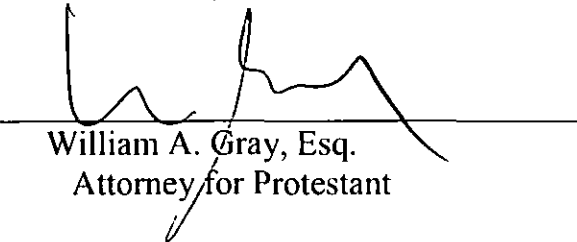
4. Protestant requests that the application be set for oral hearing and that applicant be required to prove by competent evidence the elements of proof required by statute. If an oral hearing is held, protestant will appear and present evidence in opposition to the grant of the application unless the 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: February 4, 2014

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t/d/b/a Gentle Giant Moving & Storage
Docket No. A-2013-2393811

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SECRETARY'S BUREAU

APPENDIX A

SCOPE OF AUTHORITY SOUGHT:

By application published in the Pennsylvania Bulletin on January 25, 2014,

applicant seeks authority to operate as a common carrier, transporting:

Household goods in use, from points in the City and County of Philadelphia and the Counties of Bucks, Chester, Delaware and Montgomery and from points in said counties in Pennsylvania, and vice versa.

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 the counties involved in this application 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.

SECTION 1
RULES AND REGULATIONS

ITEM 5 - SCOPE OF CARRIER'S OPERATING AUTHORITY

Rates and provisions named in this tariff, or as amended, are limited in their application on Pennsylvania intrastate traffic to the extent of the operating rights set forth below. Unless specifically provided, the provisions are to be interpreted in the same manner as the Pennsylvania Public Utility Commission interprets the Certificate from which the following is quoted.

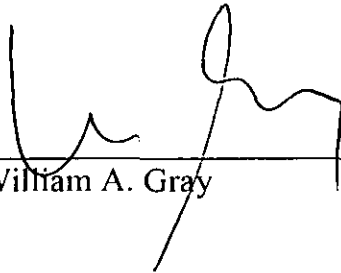
Certificate No. A-00085095 Folder 2, Am-A

- (1) To transport, as a Class D carrier, household goods, personal effects and property used or to be used in a dwelling when a part of the furnishings, equipment or supplies of such dwelling as an incidental part of a removal by the householder from one domicile to another; furniture, fixtures, equipment and the property of stores, offices, museums, institutions, hospitals or other establishments when a part of the stock, equipment or supply of such stores, offices, museums, institutions, hospitals or other establishments, when in connection with a removal from one location to another; articles, in use, including objects of art, displays and exhibits which, because of their unusual nature or value, require specialized handling and equipment usually employed in moving household goods; and tabulating machines, calculating machines, copying machines, computers, and other electronic equipment and business machines, which because of their unusual nature or value, require specialized handling and equipment usually employed in moving household goods, and parts, materials and supplies used in connection therewith, between points in the county of Centre, and from points in said county to points in Pennsylvania, and vice versa;
- (2) To transport, as a Class D carrier, household goods, personal effects and property used or to be used in a dwelling when a part of the furnishings, equipment or supplies of such dwelling as an incidental part of a removal by the householder from one domicile to another; furniture, fixtures, equipment and the property of stores, offices, museums, institutions, hospitals or other establishments when a part of the stock, equipment or supply of such stores, offices, museums, institutions, hospitals or other establishments, when in connection with a removal from one location to another; articles, in use, including objects of art, displays and exhibits which, because of their unusual nature or value, require specialized handling and equipment usually employed in moving household goods; and tabulating machines, calculating machines, copying machines, computers, and other electronic equipment and business machines, which because of their unusual nature or value, require specialized handling and equipment usually employed in moving household goods, and parts, materials and supplies used in connection therewith, for Avtex Fibers Lewistown, Inc., Lewistown Hospital, Geisinger Medical Group and the Central Pennsylvania Conference of the United Methodist Church, between points in the county of Mifflin, and from points in said county, to points in Pennsylvania, and vice versa.

Abbreviations and reference marks are explained on last page of tariff.

CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of February, 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.



William A. Gray

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Hoy Transfer, Inc.



**UNITED STATES
POSTAL SERVICE**

**Certificate Of
Mailing**

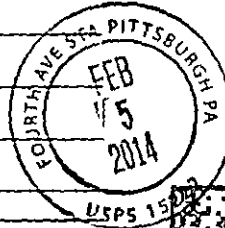
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This form may be used for domestic and international mail.

From: Vuono & Gray, LLC

310 Grant Street, Suite 2310

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:

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Secretary
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