

  
**JOHN A. PILLAR**  
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Hours by Appointment Only at:  
300 Mt. Lebanon Blvd.  
Suite 200 A  
Pittsburgh, PA 15234

April 4, 2014

Re: Hampton Township Emergency  
Medical Services  
Docket A-2014-2403391

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

Dear Secretary Chiavetta:

Enclosed is a protest filed on behalf of the following to the above-captioned application:

Byers Taxi Service, Inc.  
Manor Valley Taxi, Inc.  
Francis E. Criner, t/d/b/a Mt. Pleasant Yellow Cab  
Francis E. Criner, t/d/b/a Jeannette City Transit  
Veterans Cab Company, Inc.  
Tri County Access Co., Inc.

A copy of this protest has been served on applicant in accordance with the Commission's Rules of Practice.

Please acknowledge receipt of the enclosures on the duplicate of this letter of transmittal and return it in the stamped, self-addressed envelope provided.

Very truly yours,

  
JOHN A. PILLAR

sw

Enclosure

cc: Hampton Township Emergency Medical Services  
Manor Valley Taxi, Inc.  
Veterans Cab Company, Inc.  
Tri County Access Co., Inc.  
Byers Taxi Service, Inc.  
Francis E. Criner

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Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2014 APR -7 AM 11:50

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In re: Application of )  
HAMPTON TOWNSHIP ) Docket A-2014-2403391  
EMERGENCY MEDICAL SERVICES )

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PROTEST

In accordance with the Rules of Practice of the Pennsylvania Public Utility Commission, the carriers named herein desire to protest the above application and, in support thereof, state as follows:

1. The scope of authority sought in the application as published in the Pennsylvania Bulletin of January 25, 2014 is attached hereto as Appendix "A".

2. The names and addresses of the protestants are set forth in Appendix "B" hereto.

3. The name, address and telephone number of protestants' attorney:

JOHN A. PILLAR, ESQ.  
265 Merion Drive  
Pittsburgh, PA 15228  
412-343-0970

4. Protestants hold authority in conflict with this application as summarized in Appendix "B" attached hereto.

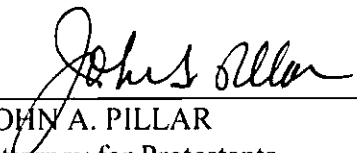
5. Protestants are presently providing service in the application area and/or are willing and able to provide such service. To the extent of protestants' authority, there is no need or demand for additional service and the proposed service is not necessary or proper for the service, accommodation, convenience or safety of the public. Protestants reserve the right to present evidence of destructive competition and/or adverse impact which would be contrary to the public interest depending on the nature and scope of the evidence presented by Applicant.

6. Protestants hereby request that the application be set for oral hearing. If an oral hearing is held, protestants represent that they will appear and present evidence pertinent to the application.

7. Pursuant to Section 333(c) of the Public Utility Code (66 Pa. C.S.A. Sec. 333(c)), protestants hereby request a list of the witnesses expected to testify in the above entitled proceeding, together with the subject matter of their anticipated testimony, and complaints, if any, or other evidence pertaining to the service of the protestants.

8. If a restrictive amendment will satisfy the interests of protestants, a proposed amendment is attached hereto as Appendix "C".

Respectfully submitted,

  
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JOHN A. PILLAR  
Attorney for Protestants

Due Date: April 14, 2014

**APPENDIX "A"**

Re: Hampton Township Emergency  
Medical Services  
Docket A-2014-2403391

Scope of Authority Sought

To transport as a common carrier, by motor vehicle, persons in paratransit service, limited to persons that require a wheelchair van transport, between points in Allegheny, Beaver, Butler, Lawrence and Westmoreland Counties.

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**APPENDIX "B"**

Re: Hampton Township Emergency  
Medical Services  
Docket A-2014-2403391

The foregoing protest to the above application is filed on behalf of the following.

**BYERS TAXI SERVICE, INC.**

214-1/2 Longfellow Street

P. O. Box 336

Vandergrift, PA 15690

Byers Taxi Service, Inc. holds authority from this Commission at Docket A-105054 to transport persons, in paratransit service, as follows:

A-105054, F.2

To transport, as a Common Carrier, Persons, in Paratransit Service, between points in the Boroughs of Vandergrift, East Vandergrift, Oklahoma and West Leechburg and the Townships of Allegheny, Washington, Bell and Upper Burrell and the Village of West Vandergrift, Westmoreland County; the Boroughs of Leechburg, North Apollo and the Townships of Kiskiminetas, Parks, Gilpin, Burrell, Bethel and South Bend, Armstrong County.

Subject to the following conditions:

1. That the applicant shall comply with all rules and regulations as set forth in 52 PA. Code §29.353 and §29.354.
2. That the service herein authorized shall be provided without the use of dome lights or taximeters.

F.2, Am-A

To transport, as a Common Carrier, Persons in Paratransit Service, from points in the Boroughs of Vandergrift, East Vandergrift, and West Leechburg, Westmoreland County, the Townships of Allegheny, Washington and Upper Burrell, Westmoreland County, the Boroughs of Leechburg, North Apollo and Apollo, Armstrong County, and the Townships of Kiskiminetas, Parks, Gilpin, Burrell, Bethel and South Bend, Armstrong County, to points in the Counties of Allegheny, Armstrong, Butler, Indiana and Westmoreland, and return.

F.2, Am-B

To transport, as a common carrier, persons, in paratransit service, between points in the cities of New Kensington, Arnold and Lower Burrell, Westmoreland County, and from points in said cities to points in Pennsylvania and return.

## APPENDIX "B" (Cont'd)

### **MANOR VALLEY TAXI, INC.**

Box 457

Manor, PA 15665

Manor Valley Taxi, Inc. is authorized, at Docket A-105983, as follows:

#### A-00105983, F.2

To transport, as a common carrier, persons, in paratransit service, between points in the Borough of Manor, Westmoreland County, and points within four (4) miles of the limits thereof, which are north of the northerly right-of-way of Consolidated Rail Corporation, the boroughs of Irwin and North Irwin, and the Township of North Huntingdon, Westmoreland County, and from points in said territory to points within an airline distance of twenty (20) statute miles of the limits of the Borough of Manor, and return.

#### A-00105983, F.2, Am-A

To transport, as a Common Carrier, Persons in Paratransit Service, between points in the Borough of Trafford, Westmoreland County, and from points in the said Borough to points within an airline distance of twenty (20) statute miles of the limits of the Borough of Trafford, and return.

#### A-00105983, F.2, Am-B

To transport, as a Common Carrier, Persons in Paratransit Service:

(1) *between points in the Boroughs of Adamsburg and Penn, and the Township of Sewickley, all located in Westmoreland County, and from points in said territory to points in Pennsylvania, and return, subject to the following conditions:*

That no right, power or privilege is granted to transport persons who, due to chronic or acute physical or mental conditions, require pre-trip preparations such as assistance in being dressed or lifted, or medical monitoring, or the use of medical appliances or equipment, or a medical escort during transit.

That no right, power or privilege is granted to provide service with vehicles having emergency vehicle registration plates or in vehicles operated by state certified emergency medical technicians.

That no right, power or privilege is granted to transport non-ambulatory persons to or from medical appointments from the Boroughs of Adamsburg and Penn, and the Township of Sewickley, except where service is provided pursuant to written agreements with federal, state or local agencies and payment is made by those agencies.

That carrier can only provide service to the curb at a person's residence and service cannot be provided if the person requires assistance in entering the person's residence.

**APPENDIX "B" (Cont'd)**

**FRANCIS E. CRINER, t/a**

**Mt. Pleasant Yellow Cab**

and

**FRANCIS E. CRINER t/a**

**Jeannette City Transit**

2 South Church Street

Mt. Pleasant, PA 15666

Mt. Pleasant Yellow Cab holds paratransit authority at Docket A-105811 as follows:

- (1) between points in the boroughs of Mt. Pleasant and Donegal, and the townships of East Huntingdon, Mt. Pleasant and Donegal, Westmoreland County, and from points in said boroughs and townships to points within 20 miles of the limits of Mt. Pleasant and return;
- (2) between points in the borough of Scottdale, Westmoreland County, and from points in said borough to points within an airline distance of 20 miles of the limits of the borough of Mt. Pleasant, and return;
- (3) between points in the township of South Huntingdon, Westmoreland County;
- (4) between points in the city of Jeannette, Westmoreland County, and within 3 miles of the limits of said city.

Jeannette City Transit, holds paratransit authority at Docket A-105811, F.2, Am-C, in defined areas of Westmoreland County, including between points in the city of Jeannette, Westmoreland County, and within 3 miles thereof; and between points in the boroughs of Murrysville, Export and Delmont, Westmoreland County, and from points in said boroughs to points within 5 miles of the limits thereof, and return.

## APPENDIX "B" (Cont'd)

### VETERANS CAB COMPANY, INC.

4146 Route 982  
Latrobe, PA 15650

Veterans Cab Company, Inc. holds paratransit authority at Docket A-96231, as follows:

#### Folder 2, Am-A

To transport, as a Common Carrier, Persons in Paratransit Service, between points in the Boroughs of Latrobe, Youngstown, Derry and New Alexandria, and the Townships of Derry, Unity and Loyalhanna, Westmoreland County, and from points in said Boroughs and Townships, to points in the Counties of Westmoreland and Allegheny, and return;

subject to the following conditions:

That no right, power or privilege is granted to transport persons in paratransit service from points in the borough of New Alexandria to the city of Jeannette and points within three (3) statute miles of the limits of said city, the city of Greensburg, the township of Salem and the Greengate Mall, all in Westmoreland County.

That no right, power or privilege is granted to provide service to the Greater Pittsburgh International Airport in the county of Allegheny.

#### Folder 2, Am-D

To transport, as a Common Carrier, Persons, in Paratransit Service:

- (1) between points in the boroughs of Mt. Pleasant, Donegal and Scottdale, and the townships of East Huntingdon, South Huntingdon, Mt. Pleasant and Donegal, Westmoreland County, and from points in said boroughs and townships, to points in the counties of Westmoreland, Fayette and Allegheny; and return; and
- (2) between points in the township of Salem and borough of New Alexandria, Westmoreland County, and from points in said township and borough, to points in the counties of Westmoreland and Allegheny, and return.

#### Folder 2, Am-E

To transport, as a common carrier, persons, in paratransit service, between points in the Boroughs of New Florence, Bolivar and Ligonier, and the Townships of Cook, Fairfield, Ligonier and St. Clair, all in Westmoreland County, and from points in said Boroughs and Township to points in Pennsylvania, and return; subject to the following condition:

That no right, power or privilege is granted to provide service to or from the Greater Pittsburgh International Airport, located in the Townships of Moon and Findlay, Allegheny County.

## APPENDIX "B" (Cont'd)

**TRI COUNTY ACCESS CO., INC.**  
4146 Route 982, Latrobe, PA 15650

Tri County Access Co., Inc. holds authority from this Commission as follows:

Certificate No. A-00121194, F.2

To transport, as a common carrier, by motor vehicle, persons, in paratransit service:

- (1) employees of Norfolk Southern and their equipment, from points in the borough of West Brownsville, Washington County, to points within an airline distance of 75 statute miles of the limits thereof, and vice versa; (2) employees of Norfolk Southern and their equipment, from points in the city of Clairton, Allegheny County, to points within an airline distance of 75 statute miles of the limits thereof, and vice versa; with right No. 2 subject to the following condition: That no right, power or privilege is granted to render service from the city of Clairton, Allegheny County, to points in the counties of Armstrong, Bedford, Blair, Cambria, Clarion, Clearfield, Jefferson, Indiana and Somerset or vice versa; with both rights No. 1 and No. 2 above subject to the following condition: That no right, power or privilege is granted to originate service at points in the boroughs of Turtle Creek, East Pittsburgh, Wilmerding, Wall, Pitcairn, North Braddock, Trafford City, Forest Hills, Monroeville, East McKeesport, Chalfont, Churchill and Plum or in the townships of Wilkins, North Versailles or Penn Hills, Allegheny County; (3) between points in the boroughs of Belle Vernon, Fayette City and Perryopolis and townships of Perry and Washington, Fayette County, the boroughs of Allenport, Bentleyville, California, Charleroi, Coal Center, Dunlevy, Elco, Ellsworth, Long Branch, New Eagle, North Charleroi, Roscoe, Speers and Stockdale, the city of Monongahela, and the townships of Carroll, Fallowfield, Somerset, Union and West Pike Run, Washington County, and the boroughs of North Belle Vernon, Smithton and West Newton, the city of Monessen and the township of Rostraver, Westmoreland County; (4) from points in the boroughs of Belle Vernon, Fayette City and Perryopolis and the townships of Perry and Washington, Fayette County, the boroughs of Allenport, Bentleyville, California, Charleroi, Coal Center, Dunlevy, Elco, Ellsworth, Long Branch, New Eagle, North Charleroi, Roscoe, Speers and Stockdale, the city of Monongahela and the townships of Carroll, Fallowfield, Somerset, Union and West Pike Run, Washington County, and the boroughs of North Belle Vernon, Smithton and West Newton, and the city of Monessen and the township of Rostraver, Westmoreland County, to points in Pennsylvania within an airline distance of 50 statute miles of the limits of the city of Monessen, Westmoreland County, limited to service for federal, state, county or local agencies under programs sponsored by said agencies; with right No. 4 subject to the following conditions: That no right, power or privilege is granted to transport persons originating within Allegheny County except that persons may be transported from points within Allegheny County to points in the specified boroughs, townships and cities served by carriers only if said persons are transported to points in Allegheny County by Tri County Access Co., Inc.; (5) between points in the borough of Donora, Washington County, and from points in said borough to points located within an airline distance of 50 statute miles of the limits of the city of Monessen, Westmoreland County, and return; (6) employees of the Pittsburgh and Lake Erie Railroad Company, from the borough of Newell, Fayette County, to points within an airline distance of 100 statute miles of the limits thereof, and vice versa.

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**APPENDIX "C"**

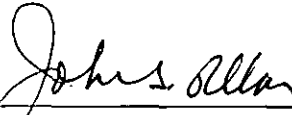
Re: Hampton Township Emergency  
Medical Services  
Docket A-2014-2403391

Protestants, Byers Taxi Service, Inc., Manor Valley Taxi, Inc., Francis E. Criner, t/d/b/a Mt. Pleasant Yellow Cab and Francis E. Criner, t/d/b/a Jeannette City Transit, Veterans Cab Company, Inc., and Tri County Access Co., Inc., would consider withdrawing their opposition to the within application if the application were amended to exclude Westmoreland County.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of April, 2014, I have served a true and correct copy of the foregoing Protest on the Applicant, by certified mail, return receipt requested, as follows:

Hampton Township Emergency Medical Services  
P. O. Box 833  
Allison Park, PA 15101

  
\_\_\_\_\_  
JOHN A. PILLAR  
Attorney for Protestants

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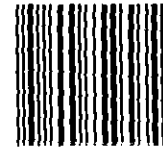
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Hon. Rosemary Chiavetta, Secretary  
Pa. Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pa 17105-3265