

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Rasier-PA, LLC : Commission Docket No:
for the right to begin transport : A-2014-2422608
by motor vehicle, persons in the :
experimental service of shared-ride network

**PROTEST OF
United Cab, LLC**

United Cab, LLC (“United”), hereby files this protest to the application of Rasier-PA, LLC (“Applicant”) for the right to begin to transport, by motor vehicle, persons the experimental service of shared-ride network for passenger trips between points in Pennsylvania, excluding those which originate or terminate in the Counties of Beaver, Clinton, Columbia, Lawrence, Lycoming, Mercer, Northumberland and Union. United respectfully requests that this Commission deny the application for the reasons set forth below.

1. The name and business address of United are:

United Cab, LLC

2304 Walnut Street

Harrisburg PA 17103

2. The name and address and telephone number of Protestant's attorney is:

Justine L. Pate, Esq.

620 S. 13th Street

Harrisburg, PA, 17104

(347) 351 – 2631

3. Protestant possesses authority at A-6412947 Protestant's operating authority is attached hereto as Exhibit A.

4. Applicant has not attached to its application: a balance sheet, projected revenue and expense statement, or any other financial information that is indicative of its financial fitness to provide

the proposed service in this area. Accordingly, Protestant believes and therefore avers that Applicant does not possess the requisite financial fitness to provide the proposed service.

5. Applicant has attached no information to its application that would indicate how Applicant intends to operate. Accordingly, United believes and therefore avers that Applicant does not possess the requisite technical fitness to provide the proposed service in such huge area.

6. Approval of this application will not serve a useful public purpose or need, but will duplicate already existing service to the detriment of existing carriers.

7. There is no need for the proposed service.

8. It would authorize additional unnecessary and harmful competition into the area with the resulting loss of revenue to United and be detrimental to the traveling public.

9. Applicant is simply making an application for regular taxi service, under the guise of 'experimental service of Transportation Network Service'. The applicant states in its description of services that applicant will pick up and transport persons, making applicant a taxi company. As such, applicant has filed the incorrect application before the Public Utility Commission.

WHEREFORE, Protestant, United Cab, LLC, respectfully requests that this Honorable Commission deny the application of Rasier-PA, LLC.

Dated: June 30, 2014

Justine L. Pate, Esq.

Representing United Cab LLC, Good Cab LLC, EZ Taxi LLC, and Keystone Cab, Inc.

620 S. 13th Street

Harrisburg, PA 17104

CERTIFICATE OF SERVICE

I, Justine L. Pate, Esq., hereby certify that a copy of the foregoing Protest was served on June 30, 2014 by United States Mail, first-class, postage pre-paid, upon the following address as follows:

Karen O. Moury
409 North Second Street
Suite 500
Harrisburg, PA 17101 – 1357

_____/s_____

EXHIBIT A

PENNSYLVANIA
PUBLIC UTILITY COMMISSION

IN THE MATTER OF: A-6412947

United Cab, LLC for the right to transport, as a common carrier, by motor vehicle, persons upon call or demand in the city of Harrisburg and within an airline distance of ten (10) statute miles of the limits of said city. A-2012-2176038

EFFECTIVE DATE: July 20, 2012

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval to operate.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 4th day of January, 2013.


Secretary