

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Rasier-PA, LLC : A-2014-2422608
for the right to begin transport by motor :
vehicle, persons in the experimental :
service of shared-ride network :

**PROTEST OF
Good Cab, LLC**

Good Cab, LLC. (“Good”), hereby files this protest to the application of Rasier-PA, LLC (“Applicant”) for the right to transport, as a common carrier, by motor vehicle, persons in 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, Crawford, Lawrence, Lycoming, Mercer, Northumberland and Union. Good respectfully requests that this Commission deny the application for the reasons set forth below.

1. The name and business address of Good are:

Good Cab, LLC, Inc.

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-00120846 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, Good 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 Good 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, Good Cab, LLC respectfully requests that this Honorable Commission deny the application of Rasier-PA, LLC.

Dated: June 30, 2014

_____s_____

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:

Penn Township Emergency Services, Inc.
204 Clover Lane
Hanover, York County, PA 17331

_____/s_____

EXHIBIT A



COMMONWEALTH OF PENNSYLVANIA^{IN REPLY PLEASE}
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

December 19, 2011

A-00120846

CRAIG A DOLL ESQUIRE
25 WEST SECOND STREET
PO BOX 403
HUMMELSTOWN PA 17036-0403

Request for Change of Entity for the Carrier: Hesham A. Medled, d/b/a Harrisburg Taxi to Good Cab, LLC

To Whom It May Concern:

The records of the Commission show that applicant has complied with the necessary requirements and the Commission's records are so noted showing the new name on the certificate of public convenience.

If you wish to have the original certificate changed to reflect the new name, you will have to send it to the Commission. Please send your request for an updated certificate and the original certificate to:

PA Public Utility Commission
Secretary's Bureau
Order Entry/Service Section
P O Box 3265
Harrisburg, PA 17105-3265

If you do not wish to have a different certificate, simply attach this letter to the Commission's Secretarial letter you received earlier, and keep these documents with your original certificate.

Thank you for your cooperation in this matter.

Very truly yours,

Rosemary Chiavetta
Secretary

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Public Meeting held March 23, 2005

Commissioners Present:

**Wendell F. Holland, Chairman
Robert K. Bloom, Vice-Chairman
Kim Pizzingrilli**

Application of Hesham A. Mekled, for the right to begin to transport, as a common carrier, by motor vehicle, persons, upon call or demand, in the counties of Dauphin and Cumberland.

A-00120846

Hesham A. Mekled, applicant, pro se.

ORDER

BY THE COMMISSION:

This matter comes before the Commission on an application filed May 4, 2004. Public notice of the application was given in the *Pennsylvania Bulletin* of July 3, 2004 with protests due by July 26, 2004. No protests were filed.

By letter dated August 5, 2004, the verified statement of applicant and verified statements of support were requested, with the statements due by September 6, 2004. The applicant requested, and was granted two thirty (30) day extensions of time to file the statements. The statements were received on December 1, 2004. The unopposed application is certified to the Commission for its decision without oral hearing.

DISCUSSION AND FINDINGS

Hesham Mekled (applicant or Mekled) seeks the initial right to provide call or demand service. The applicant's terminal facility will be located at 900 South 17th Street, Harrisburg, Dauphin County. This facility contains office space, a room for dispatching, a waiting area, and enough parking for the applicant's vehicles. Communications with the public will be by three land phones, and drivers will be contacted by a dispatcher using a two-way radio.

Operations will be commenced using ten vehicles. Mekled anticipates adding another five vehicles within the first month of operations. Vehicle maintenance will be performed by an outside garage. The vehicles will be subject to a comprehensive maintenance program. Approximately ten full-time and three to four part-time drivers will be hired. Drivers will go through an orientation and training program. Drug and alcohol testing of drivers will be conducted prior to hiring. Random drug and alcohol testing will be conducted during work hours.

Hesham Mekled has ten years experience in the transportation industry, with excellent management experience. Mekled worked during those ten years for Yellow Cab Company in Baltimore, Maryland, first as a driver, and then as a manager.

The most recent balance sheet of the applicant dated November 11, 2004, shows total current assets of \$48,700, total assets of \$81,200, total current liabilities of \$3,000, total liabilities of \$3,000 and a net worth of \$78,200.

Support for the application comes from a total of nine parties. Five of the parties reside in the county of Dauphin and four parties reside in the county of Cumberland. The parties state that currently the cabs do not provide reliable and timely service. All of the parties support applicant in hopes of receiving better service.

After complete review of the record, we find:

1. Applicant seeks the initial right to provide call or demand service and the application is unopposed.
2. The application is supported by nine parties.
3. Applicant has the equipment, ability and fitness necessary to render the service.
4. The evidence of record is sufficient to establish necessity for the service.
5. Approval of the application is necessary for the accommodation and convenience of the public; **THEREFORE,**

IT IS ORDERED: That the application be and is hereby approved granting the following right:

To transport, as a common carrier, persons, upon call or demand, in the counties of Dauphin and Cumberland.

IT IS FURTHER ORDERED: That the applicant shall not engage in any transportation authorized by this order until the following is submitted to the Commission:

1. Form E, as evidence of bodily injury and property damage liability insurance.
2. A tariff establishing just and reasonable rates.

IT IS FURTHER ORDERED: That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the applicant, shall not be construed as conferring more than one operating right.

IT IS FURTHER ORDERED: That upon compliance with the requirements hereinbefore set forth, a certificate shall issue evidencing the Commission's approval of the right to operate as above determined.

IT IS FURTHER ORDERED: That in the event said applicant has not, on or before sixty (60) days from the date of the service of this order, complied with the requirements hereinbefore set forth, the application shall be dismissed without further proceedings.

BY THE COMMISSION,

James J. McNulty
Secretary

(SEAL)

ORDER ADOPTED: March 23, 2005

ORDER ENTERED: March 24, 2005