

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Rasier-PA, LLC :
: **A-2014-2424608**

PROTEST

Capital City Cab Service, Inc., through its attorney Joseph T. Sucec, Esq., hereby files this petition in protest of the above-stated Application, averring as follows:

1 Applicant's name is **Rasier-PA, LLC**, with a listed address of 182 Howard Street #8, San Francisco, CA 94105, and the Application is docketed at **A-2014-2424608**

2 Protestant is Capital City Cab Service (Capital City), 362 South Front Street, Steelton, PA 17113, holder of a Certificate of Public Convenience at A-00113875, a copy of which is attached to this petition, along with a statement indicating that Capital City's coverage area includes Dauphin and Cumberland Counties, the area for which authority is sought for in the present application.

3 Capital City protests this Application for the following reasons:

A Said Application requests authority to operate in 58 of 67 Pennsylvania counties, among them Dauphin, Cumberland, Perry and York counties. There are at least eight existing Certificated carriers authorized at least partially for those counties: AA Yellow Cab, Harrisburg City Cab, Keystone Cab Service, EZ Taxi, Capital City Cab Service, AAA Alpine, Amigo Cab, and The New Yellow Cab. The existing carriers more than meet the public need for cab service in the counties requested.

B While Applicant claims to be seeking authority for "the experimental service of shared-ride network for passenger trips," Applicant actually seeks to operate a standard call and demand service, but with members of the public enlisted as drivers.

C Protestant submits that, while it and its fellow call and demand competitors are required by the Commission to adhere to standards of safety and service, the inherent inconsistency of such an operation as Applicant's creates major problems for the riding public. Said Applicant therefore lacks the inherent financial and technical expertise required pursuant to 52 Pa. Code 41.14.

D Capital City reserves the right to submit additional reasons for its protest at a later time.

WHEREFORE Capital City Cab Service respectfully requests that the above application be dismissed.

Date: 6/30/14

Respectfully submitted,

/s/Joseph T. Sucec

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CERTIFICATE OF SERVICE

I hereby certify that on the below-stated date I served by first-class mail a true and correct copy of the Protest in the above-captioned matter on the following:

Rasier-PA, LLC
182 Howard Street #8
San Francisco, CA 94105

Date: 6/30/14

/s/Joseph T. Sucec, Esq.
