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Kenneth A. Olsen
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33 Philhower Road
Lebanon, New Jersey 08833

Via FedEx Airbill 8047 3622 9079

June 24, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Dear Madam Secretary:

Re: Application of B & C Limousine Service, Inc.
No. A-2014-2419223

Please be advised I represent Protestant, J & J Leasing & Rentals, Inc. in the above referred to application proceeding. My Pennsylvania Supreme Court Identification Number is 29681.

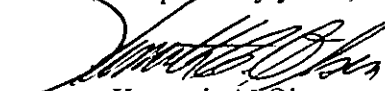
Attached hereto, for filing with your Commission on behalf of my client, find original and one copy of Protest of J & J Leasing & Rentals, Inc. to the Application of B & C Limousine Service, Inc.

I hereby certify that the aforesaid and attached Protest was today given and deposited with the overnight courier, FEDEX Express, for delivery to this Commission, and delivery by First Class Mail to Applicant, as listed on the attached Certificate of Service by (Copy of FEDEX Express airbill receipt is attached hereto).

Kindly acknowledge receipt on the duplicate of this letter attached. A self-addressed stamped envelope is enclosed for your convenience.

If you have any questions relative to any of the above or attached, or require additional information, do not hesitate to contact me. Your courtesies and considerations are appreciated.

Respectfully yours,



Kenneth A. Olsen

KAO:amo

Enc.

cc with enc.: B & C Limousine Service, Inc. (Via First Class Mail)
J & J Leasing & Rentals, Inc. (Via First Class Mail)

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JUN 24 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 24 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

IN RE: APPLICATION OF
B & C LIMOUSINE SERVICE, LLC

:
:
: Docket No. A-2014-2419223
:
:

PROTEST OF J & J LEASING & RENTALS, INC.

Comes now, Protestant, J & J Leasing & Rentals, Inc., with address and place of business as 445 Business Park Lane, Allentown, Pennsylvania 18109, by and through its attorney, and in accordance with the Rules of Practice of the Commission, submits this, its Protest, to the above captioned Application, for a certificate of public convenience, and states the basis of which is as follows:

1. Applicant's name and Application docket number are: B & C Limousine Service, LLC, 985 Donald Drive, Emmaus, PA 18049, and Docket No. A-2014-2419223.

2. Protestant's business name, address, and telephone are: J & J Leasing & Rentals, Inc., 445 Business Park Lane, Allentown, Pennsylvania 18109, telephone (610) 776-1516.

3. Protestant's attorney's name, address, and telephone are: Kenneth A. Olsen, Esq., 33 Philhower Road, Lebanon, NJ 08833, telephone (908) 832-9207, fax (908) 832-5403.

4. The name, address, and telephone number of Applicant's attorney is presently unknown.

5. The nature of Protestant's interests in the Application and statement of adverse impact upon Protestant and the public is as follows:

(A) The nature of Protestant's interests is the scope of authority sought in the application. Applicant seeks authority to transport persons, in limousine service, between points, within the borough limits of Emmaus,

Lehigh County.

Protestant presently holds operating authority from this Commission under Certificate No. A-00105282, Folder 1, Am-A and Am-C, and operates thereunder to transport as a common carrier, by motor vehicle, persons, in limousine services, between points in the counties of Lehigh and Northampton, and from points in said counties to points in Pennsylvania, and return; and to transport as a common carrier, by motor vehicle, persons, in limousine service, between points in the counties of Carbon, Luzerne and Monroe, and from points in said counties to points in Pennsylvania, and return.

(B) The adverse impact of the Application on Protestant is that, if Applicant is granted the authority to transport persons, in limousine service, between points in the borough of Emmaus, County, areas in which Protestant currently renders service, it will adversely affect Protestant's ability to render a service to the public in its authorized territory. A grant of the Application will jeopardize Protestant's traffic in a substantial portion of its authorized territory, thereby jeopardizing its service to the public.

There is no need for the certificate of public convenience requested.

(C) Further, Protestant challenges the Applicant's fitness to perform the proposed service due to: (1) Applicant's failure to demonstrate that it has sufficient capital, equipment, facilities, and other resources necessary to safely and lawfully serve the requested territory; (2) Applicant's failure to demonstrate it and its employees have sufficient technical expertise and experience to serve the requested territory; (3) Applicant's failure to

demonstrate its ability to secure adequate and continuous insurance coverage; and (4) Applicant's failure to demonstrate it has appropriate plans or policies required to comply with Commission orders and regulations, the Commission's driver and vehicle safety regulations and service standards, and the Commission's regulations regarding driver criminal and moral turpitude convictions history.

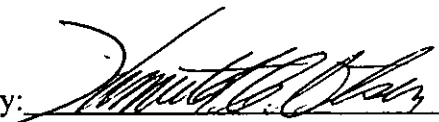
6. The Commission's docket numbers under which Protestant operates its authorized limousine service is Certificate No. A-00105282, Folder 1, Am-A and Am-C, (an extract of which is attached hereto as Exhibit A).

7. A restriction to the Application that would protect Protestant's interest herein and result in the withdrawal of the instant Protest would be for Applicant to restrict the Application to services in a geographic territory that would not adversely impact upon the present operations and authority of Protestant.

8. Pursuant to 66 Pa. C. S. § 333(c), demand is hereby made upon Applicant to provide Protestant's attorney with a list identifying the names, addresses, and group or company affiliation of any or all witnesses expected to testify in this Application proceeding, together with the subject matter (including documents, if any) of their expected testimony.

WHEREFORE, the above premises be considered, Protestant respectfully prays this Application be dismissed and denied.

Dated: June 24, 2014

By: 
Kenneth A. Olsen
Attorney for Protestant
33 Philhower Road
Lebanon, New Jersey 08833
Phone (908) 832-9207
Pennsylvania Attorney ID No. 29681

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Exhibit A

Certificate No. A-00105282

Folder 1, Am-A and Am-C

J & J LEASING & RENTALS, INC.

Limousine Tariff Naming Rates, Rules, and Regulations Governing the Transportation of Persons in Limousine Service Between Points in Pennsylvania, as follows:

To transport as a common carrier, by motor vehicle, persons, in limousine service, between points in the counties of Lehigh and Northampton, and from points in said counties to points in Pennsylvania, and return; and

To transport as a common carrier, by motor vehicle, persons, in limousine service, between points in the counties of Carbon, Luzerne and Monroe, and from points in said counties to points in Pennsylvania, and return;

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document, Protest of J & J Leasing & Rentals, Inc., upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(Via Federal Express, overnight, prepaid)

B & C Limousine Service, LLC
985 Donald Drive
Emmaus, PA 18049
(Via First Class Mail, postage prepaid)

RECEIVED

JUN 24 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dated: June 24, 2014

By: 

Kenneth A. Olsen
Attorney for Protestant
33 Philhower Road
Lebanon, New Jersey 08833
Phone (908) 832-9207
Pennsylvania Attorney ID No. 29681

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FedEx Package Express **US Airbill**

FedEx Tracking Number

8047 3622 9079

Form ID No

0215

Recipient's Copy

1 From

Date 6/24/14

Sender's Name KENNETH OLSEN Phone 908 832-9207

Company KENNETH A OLSEN LAW FIRM

Address 39 PHILHOWER RD
Dept./Floor/Suite/Room

City LEBANON State NJ ZIP 08833-4537

2 Your Internal Billing Reference

3 To

Recipient's Name ROSEMARY CHIAVETTA ^{SFC.} Phone 717-772-7777

Company PENNSYLVANIA PUBLIC UTILITY COMM. COMMONWEALTH

Address KEYSTONE BLDG - 2D FLOOR
We cannot deliver to A.D. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room

Address 400 NORTH ST.
Use this line for the HOLD location address or for continuation of your shipping address.

City HARRISBURG State PA ZIP 17120

0113124589



8047 3622 9079

4 Express Package Service * To most locations.
NOTE: Service order has changed. Please select carefully

Packages up to 150 lbs.
For packages over 150 lbs. use the FedEx Express Freight US Airbill

Next Business Day

FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Priority Overnight
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Standard Overnight
Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

FedEx 2Day A.M.
Second business morning. Saturday Delivery NOT available.

FedEx 2Day
Second business afternoon. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Express Saver
Third business day. Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options

SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

No Signature Required
Package may be left without obtaining a signature for delivery.

Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.

Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies. Residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

No Yes Yes Shipper's Declaration not required Dry Ice
Dry Ice, 9 JUN 1845 _____ kg

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box. Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.

Sender Acct. No. in Section 1 will bill. Recipient Third Party Credit Card Cash/Check

Total Packages _____ Total Weight _____
_____ lbs. _____

Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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