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October 22, 2014

VIA ELECTRONIC AND FIRST CLASS MAIL

Honorable Dennis J. Buckley
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101

RE: Application of Appalachian Movers, LLC; Docket No. A-2014-2418497;
PREHEARING MEMORANDUM OF APPALACHIAN MOVERS, LLC

Dear Judge Buckley:

Enclosed is the Prehearing Memorandum of Appalachian Movers, LLC in the above-captioned matter. This document has been filed with the Secretary's Office and copies have been served in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

Judith D. Cassel
Counsel to Appalachian Movers, LLC

SKH/jld

Enclosure

cc: Rosemary Chiavetta, Secretary (via electronic filing)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Appalachian Movers, LLC

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Docket No. A-2014-2418497

**PREHEARING MEMORANDUM OF
APPALACHIAN MOVERS, LLC**

TO: THE HONORABLE DENNIS J. BUCKLEY

Pursuant to Your Honor's October 17, 2014 Prehearing Order in the above-captioned proceeding, Appalachian Movers, LLC ("Appalachian"), by and through its attorneys in this matter, Hawke McKeon & Sniscak LLP, hereby submits its Prehearing Memorandum.

a. Acceptance of Service

Service of documents in this proceeding shall be accepted on behalf of Appalachian by:

Judith D. Cassel
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
Phone: 717-236-1300
Fax: 717-236-4841
jdcassel@hmslegal.com

Appalachian is willing to accept service of documents in electronic format.

b. Witnesses

Appalachian may present testimony from the following persons as witnesses in this proceeding:

Thomas Dilella, Owner
Appalachian Movers, LLC
221 Belle Avenue
Boalsburg, PA 16827
(814) 650-7293

Mr. Dilella will testify about the type of service that Appalachian currently provides, the need for the service proposed in the application, and the Applicant's financial, technical and legal fitness.

Jeffrey Gregg
(814) 234-0529

If called, Mr. Gregg will testify about the need for the proposed service, his anticipated need for household goods moving services in the future and his intention to use the Applicant if the application is approved.

Appalachian reserves the right to adopt the testimony of other witnesses, in whole or in part, and to offer additional witnesses and exhibits as may be necessary to address the testimony, exhibits, or evidence presented by other parties in this proceeding.

c. Issues

The issues in this proceeding are set forth in the Commission's regulations at 52 Pa. Code §41.14 which provides in pertinent part:

§41.14. Evidentiary criteria used to decide motor common carrier applications – statement of policy.

(a) An applicant seeking motor common carrier authority has a burden of demonstrating that approval of the application will serve a useful public purpose, responsive to a public demand or need.

(b) An applicant seeking motor common carrier authority has a burden of demonstrating that it possesses the technical and financial ability to provide the proposed service. In addition, authority may be withheld if the record demonstrates that the applicant lacks a propensity to operate safely and legally. In evaluating whether a motor carrier applicant can satisfy these fitness standards, the Commission will ordinarily examine the following factors, when applicable:

(1) Whether an applicant has sufficient capital, equipment, facilities and other resources necessary to serve the territory requested.

(2) Whether an applicant and its employees have sufficient technical expertise and experience to serve the territory requested.

(3) Whether an applicant has or is able to secure sufficient and continuous insurance coverage for all vehicles to be used or useful in the provision of service to the public.

(4) Whether the applicant has an appropriate plan to comply with the Commission's driver and vehicle safety regulations and service standards contained in Chapter 29 (relating to motor carriers of passengers).

(5) An applicant's record, if any, of compliance with 66 Pa.C.S. (relating to the Public Utility Code), this title and the Commission's orders.

(6) Whether an applicant or its drivers have been convicted of a felony or crime of moral turpitude and remains subject to supervision by a court or correctional institution.

(c) The Commission will grant motor common carrier authority commensurate with the demonstrated public need unless it is established that the entry of a new carrier into the field would endanger or impair the operations of existing common carriers to an extent that, on balance, the granting of authority would be contrary to the public interest.

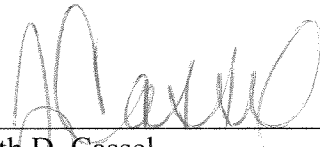
Through the direct testimony of its witnesses, Appalachian may address each of the issues set forth in 52 Pa. Code §41.14. Applicant will present evidence proving that there is a need for the proposed service and that it possesses the necessary financial, technical and legal fitness to support approval of its application.

d. Presentation of Evidence

Appalachian’s direct case will be presented through the testimony of its owner, Thomas Dilello, and its supporting witness, Jeffrey Gregg. Mr. Dilella’s testimony will include the issue of need for additional service in the applied-for territory, as well as issues related to the Applicant’s financial, technical and legal fitness. Mr. Gregg will testify about the need for the proposed service, his anticipated need for household goods moving services in the future and his intention to use the Applicant if the application is approved.

WHEREFORE, Appalachian Movers, LLC respectfully submits this Prehearing Memorandum.

Respectfully submitted,



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Counsel to Appalachian Movers, LLC

Date: October 22, 2014

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Appalachian Movers, LLC

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Docket No. A-2014-2418497

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing
Prehearing Memorandum upon the persons and in the manner indicated below.

SERVICE BY ELECTRONIC AND FIRST CLASS MAIL

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Judith D. Cassel

DATE: October 22, 2014