



ZELECHIWSKY
Law Offices

211 W. Broad Street • PO Box 1414 • Bethlehem, PA 18016 • Phone: 610-691-3868 • Fax: 610-866-4626

Bohdan J. Zelechiwsky
Attorney at Law

October 24, 2014

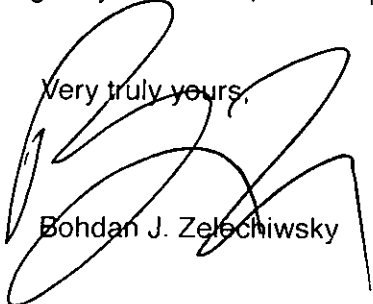
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission, Bureau
of Investigation and Enforcement v. DOE-R_DIE, Inc.
Docket No. C-2014-2441813**

Dear Ms. Chiavetta,

Please be advised that my office represents the respondent in the above captioned matter. Enclosed herewith please find an answer to the complaint to be filed with your office. By copy of this letter with enclosure, I will be serving Wayne T. Scott, First Deputy Chief Prosecutor. Thank you.

Very truly yours,


Bohdan J. Zelechiwsky

BKZ/ke

xc: Wayne T. Scott, Esq w/enc.
Harry Rivera, w/enc.

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION, BUREAU OF : DOCKET NO. C-2014-2441813
INVESTIGATION AND ENFORCEMENT :

V. :

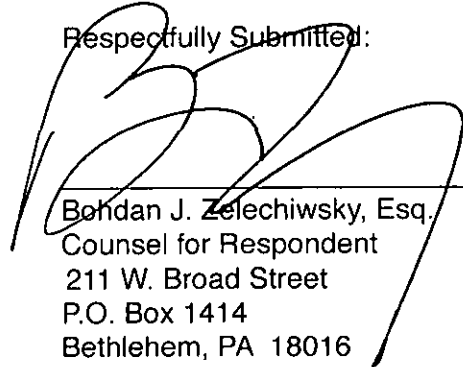
DOE-R-DIE INC
PO BOX 5364
BETHLEHEM, PA 18015

ANSWER OF DOE-R-DIE, INC TO COMPLAINT

1. Denied. This statement contains a conclusion of law to which no response is required.
2. Admitted as stated.
3. Admitted as stated.
4. Admitted in part and denied in part. It is admitted that the respondent has failed to provide evidence of liability and cargo insurance on file with the Commission. It is specifically denied that said failure was intentional insofar as the respondent's vehicle (2006 Freightliner Conventional truck Vin#1FUJA6CV96LV73149) was involved in an accident on May 27, 2014 and was totaled and not utilized on the highways and roads of the commonwealth of Pennsylvania after May 27, 2014 except as noted in the Restricted Travel Endorsement issued by owner-Operator Services Incorporated effective May 28, 2014. Attached hereto as Exhibit "A".
5. Denied. This statement constitutes a conclusion of law to which no response is required.

WHEREFORE, respondent, DOE-R-DIE, INC., prays that this Commission dismiss the pending complaint and issue a finding in favor of the respondent.

Respectfully Submitted:

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the bottom.

Bohdan J. Zelechiwsky, Esq.
Counsel for Respondent
211 W. Broad Street
P.O. Box 1414
Bethlehem, PA 18016



Owner-Operator Services Incorporated

A subsidiary of Owner-Operator Independent Drivers Association Inc.

June 10, 2014

1 NW OOIDA Drive • P O Box 1000

Grain Valley, Missouri 64029

Tel: (800) 715-9369 • (816) 229-5791

Fax lines: (816) 427-4467 • (816) 427-4469

(816) 229-5370 • (816) 867-2153

e-mail: truck_fax@ooida.com • ooida@ooida.com

web site: www.ooida.com

HARRY RIVERA
PO BOX 5364
BETHLEHEM, PA 18015-0364

Dear Harry:

The enclosed document reflects the recent change to your Truck Insurance Policy. Please review it carefully for accuracy, then sign and return the original to us in order to complete your file and insure accurate billing. The additional copy is for your records. For your convenience we have enclosed a self-addressed envelope.

Again, we would like to thank you for giving us the opportunity to handle your truck insurance needs. We welcome your comments and suggestions in regard to how we might serve you better. If you have any questions concerning the enclosed paperwork, or would like additional information on any of the other programs available to you as a member of OOIDA, please don't hesitate to contact your truck insurance agent at 1-800-715-9369.

Sincerely,

Truck Insurance
Billing Department

Exhibit "A"

06/18/2014

POLICY CHANGE ENDORSEMENT

TERRYL/EAPT001R
PAGE:

The following summary reflects changes made to your vehicle coverage. Please review these changes.
At the bottom of this form and return one copy in the enclosed envelope.

Insured: DOE-R-DIE INC.

PO BOX 5364
BETHLEHEM, PA 18015-0364

Alternate Address
304 N IRVING ST
ALLENTOWN, PA 18109-2617

Cust#:1107310 Seq#: 1
Agent ID: TERRYL
Effective date:05/28/2014

POLICY NAMES:
RRG - PL199515326A - DOE-R-DIE INC.
CUL - CUL59020 - DOE-R-DIE INC.

KEEP COPIES
FOR YOUR RECORD

EQUIPMENT CHANGES:
0000 UNDESCRIBED VAN TRAILER WITH VIN# NONOWN/UNDESCTRL1 WAS REMOVED.

COVERAGE CHANGES:
PRIMARY LIABILITY COVERAGE WAS UPDATED FOR THE 2006 FREIGHTLINER CONVENTIONAL TRUCK WITH VIN# 1FUJA6CV96LV73149
PRIMARY LIABILITY COVERAGE WAS REMOVED FROM THE 0000 UNDESCRIBED VAN TRAILER WITH VIN# NONOWN/UNDESCTRL1
050,001-150,000 COVERAGE WAS UPDATED FOR THE 2006 FREIGHTLINER CONVENTIONAL TRUCK WITH VIN# 1FUJA6CV96LV73149
THE DEDUCTIBLE FOR THIS COVERAGE IS \$1,000.
PERSONAL INJURY COVERAGE WAS UPDATED FOR THE 2006 FREIGHTLINER CONVENTIONAL TRUCK WITH VIN# 1FUJA6CV96LV73149
UNDERINSURED MOTORIST COVERAGE WAS UPDATED FOR THE 2006 FREIGHTLINER CONVENTIONAL TRUCK WITH VIN# 1FUJA6CV96LV73149
UNINSURED MOTORIST COVERAGE WAS UPDATED FOR THE 2006 FREIGHTLINER CONVENTIONAL TRUCK WITH VIN# 1FUJA6CV96LV73149
COL DAMAGE (CUL) 2 COVERAGE WAS REMOVED FROM THE 2006 FREIGHTLINER CONVENTIONAL TRUCK WITH VIN# 1FUJA6CV96LV73149
THE DEDUCTIBLE FOR THIS COVERAGE IS \$1,000.
COL DAMAGE (CUL) 2 COVERAGE WAS UPDATED FOR THE 1999 WABASH DRY VAN TRAILER WITH VIN# IJJV532W6XL544089
THE DEDUCTIBLE FOR THIS COVERAGE IS \$1,000.
OWN COVERAGE WAS REMOVED FROM THE 2006 FREIGHTLINER CONVENTIONAL TRUCK WITH VIN# 1FUJA6CV96LV73149

INTERESTED PARTY CHANGES:
ADDITIONAL INSURED#77882 WAS DELETED: JB HUNT TRANSPORT, INC
PO BOX 1745
LOWELL, AR 72745 FOR RRG PRIMARY LIABILITY AND VIN# NONOWN/UNDESCTRL1

PREMIUM COMPUTATIONS:

Plan	From Date	To Date	Deposit+	Deposit-	Premium+	Premium-	Vin#
Car RRGPRIM	05/28/2014	06/18/2014	.00	.00	.00	173.65	1FUJA6CV96LV73149
RRG RRGPRIM	06/18/2014	07/18/2014	.00	.00	.00	247.59	1FUJA6CV96LV73149
RRG RRGPRIM	05/28/2014	06/18/2014	.00	12.50	.00	8.77	NONOWN/UNDESCTRL1
RRG RRGPRIM	06/18/2014	07/18/2014	.00	.00	.00	12.50	NONOWN/UNDESCTRL1
RRG RRGCRG12	05/28/2014	06/18/2014	.00	.00	.00	48.48	1FUJA6CV96LV73149
RRG RRGCRG12	06/18/2014	07/18/2014	.00	.00	.00	69.10	1FUJA6CV96LV73149
RRG RRGPLP1P	05/28/2014	06/18/2014	.00	.00	.00	5.86	1FUJA6CV96LV73149
RRG RRGPLP1P	06/18/2014	07/18/2014	.00	.00	.00	8.33	1FUJA6CV96LV73149
RRG RRGPLUM	05/28/2014	06/18/2014	.00	.00	.00	1.47	1FUJA6CV96LV73149
RRG RRGPLUM	06/18/2014	07/18/2014	.00	.00	.00	2.08	1FUJA6CV96LV73149
RRG RRGPLUM	05/28/2014	06/18/2014	.00	.00	.00	1.47	1FUJA6CV96LV73149
RRG RRGPLUM	06/18/2014	07/18/2014	.00	.00	.00	2.08	1FUJA6CV96LV73149
RRG RRGPHYS2	05/28/2014	06/18/2014	.00	.00	.00	89.67	1FUJA6CV96LV73149
CUL CULPHYS2	06/18/2014	07/18/2014	.00	.00	.00	127.85	1FUJA6CV96LV73149
CUL CULBREAK	05/28/2014	06/18/2014	.00	.00	.00	20.31	1FUJA6CV96LV73149
CUL CULBREAK	06/18/2014	07/18/2014	.00	.00	.00	28.97	1FUJA6CV96LV73149

Your new monthly premium will be 119.69, your new annual premium will be 1,461.25.

RESPONSES AND REMARKS:
Garage location street address?:NA
Garage location-City?:NA
Garage location-State?:NA
Garage Location - Zip code?:NA
Garage is equipment titled? Who's name?:NA
How is equipment needed for special equip? (Y/N):NA
Coverage values Actual Cash Value? (Y/N):NA
Are all ACV then explain:NA
If not ACV, LDP, DT, BD, RR, TWCL, TI, PerPrp?:NA
Need GAP commodities hauled:NA
List ALL equipment and value.:NA
List special equipped with theft alarms?:NA
Are vehicles equipped with theft alarms?:NA
If Yes, what type of alarm system?:NA
Could equip purchase qualify for rebate?:NA
Did you transfer to Membership for info?:NA

POLICY NUMBER: PL199515326A

This endorsement changes the policy please read it carefully.

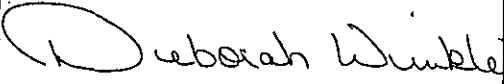
RESTRICTED TRAVEL AREA FOR SPECIFIED "AUTO."

This endorsement modifies insurance provided under the following:

MOTOR CARRIER COVERAGE FORM

With respect to coverage provided by this endorsement, the provisions of the Coverage Form apply unless modified by the endorsement.

This endorsement changes the policy effective on the inception date of the policy unless another date is indicated below.

Endorsement Effective: 05/28/2014	Countersigned By:  (Authorized Representative)
Named Insured: DOE-R-DIE INC.	

Schedule

Year	Make	Model	Vehicle Identification Number
2006	FREIGHTLINER	CONVENTIONAL	1FUJA6CV96LV73149

The unit listed above is restricted to 25-mile radius of garaging location due to not operating in the named insured's operation as a motor carrier for hire. Except for maintaining or testing covered "autos" on your property, the coverages and "autos" indicated in this endorsement are restricted as of the effective date of this endorsement.

OUR RIGHT TO REIMBURSEMENT

To settle any claim or "suit" we may pay all or any part shown in the Schedule. If this happens, you must reimburse us for the deductible or the part we paid.

RGP 10 14 03 05



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PA PUBLIC
SECRETARY'S BUREAU

LEHIGH VALLEY PA 180

29 OCT 2014 PM



Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

17105326565

