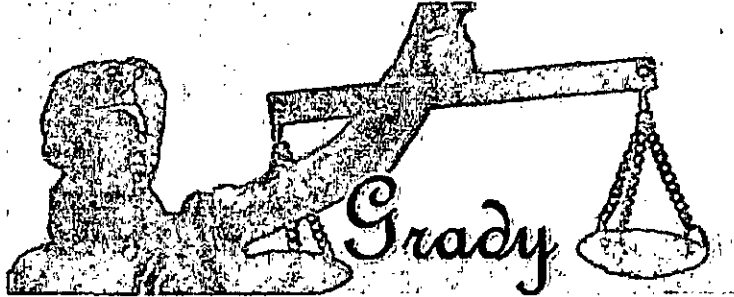


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JAN - 9 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



BRIAN GRADY, ESQUIRE

TWO PENN CENTER PLAZA
1500 JFK BLVD, SUITE 1020
PHILADELPHIA, PA 19102
(215) 496-9000
FAX: (215) - 751-1660

January 9, 2015

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

C-2014-2437267

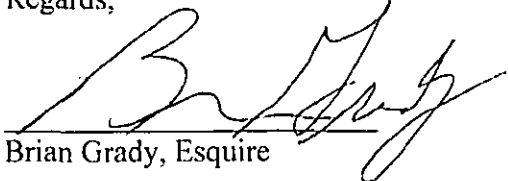
RE: **PENNSYLVANIA PUBLIC UTILITY COMMISSION
BUREAU OF INVESTIGATION AND ENFORCEMENT**
V.
KEYSTONE QUALITY TRANSPORT COMPANY

Dear Sir/Madam,

Enclosed herewith please find the Defendant's answer to the complaint filed with regard to the above captioned matter. Please don't hesitate to contact me with any questions. Thank you.

\$950.00 check
#60778585-1

Regards,


Brian Grady, Esquire

Enclosures

GRADY LAW OFFICES
BY: BRIAN GRADY, ESQUIRE
ATTORNEY I. D. NO. 71459
TWO PENN CENTER
1500 JFL BLVD., SUITE 1020
PHILADELPHIA, PA 19102
(215) 496-9000
brian@gradytime.com

RECEIVED

ATTORNEY FOR DEFENDANTS

JAN - 9 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY COMMISSION :
BUREAU OF INVESTIGATION AND ENFORCEMENT :
: :
: V. :
: DOCKET NO. C-2014-2437267 :
KEYSTONE QUALITY TRANSPORT :
1260 WOODLAND AVENUE :
SPRINGFIELD, PA 19064 :
:
:

**DEFENDANT KEYSTONE QUALITY TRANSPORTS ANSWER TO
TO PLAINTIFFS COMPLAINT**

Defendants, by and through their attorney, Brian Grady, Esquire, hereby files the within
Answer to the Complaint by Pennsylvania Public Utility Commission, and replies as follows:

1. Admitted.
2. Admitted.
3. Denied. On information and belief, there had been no previous annual inspections for the previous five years, other than occasional spot checks in the field by way of further response, respondent cannot speak to the assertions regarding PUC personnel.
4. Admitted.
5. Denied. By way of further response, any deficiencies noted during any inspection were remedied immediately after the inspections occurred.
Additionally, a corrective action plan was provided to Officer Joseph Ballard.

Also, at the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

6. Admitted.

7. Denied. By way of further response, any deficiencies noted during any inspection were remedied immediately after the inspections occurred.

Additionally, a corrective action plan was provided to Officer Joseph Ballard.

Also, at the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

8. Admitted

9. Denied. By way of further response, any deficiencies noted during any inspection were remedied immediately after the inspections occurred.

Additionally, a corrective action plan was provided to Officer Joseph Ballard.

Also, at the time of inspection, certain vehicles were labeled “Em Star” and

Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

10. Admitted

11. Denied. At the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

12. Admitted

13. Denied. At the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

14. Admitted

15. Denied. By way of further response, any deficiencies noted during any inspection were remedied immediately after the inspections occurred. Additionally, a corrective action plan was provided to Officer Joseph Ballard.

16. Admitted

17. Denied. By way of further response, any deficiencies noted during any inspection were remedied immediately after the inspections occurred. Additionally, a corrective action plan was provided to Officer Joseph Ballard. Also, at the time of inspection, certain vehicles were labeled "Em Star" and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

18. Admitted.

19. Denied. At the time of inspection, certain vehicles were labeled "Em Star" and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

20. Admitted.

21. Denied. By way of further response, any deficiencies noted during any inspection were remedied immediately after the inspections occurred. Additionally, a corrective action plan was provided to Officer Joseph Ballard. Also, at the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

22. Admitted.

23. Denied. At the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

24. Admitted.

25. Denied. At the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the

DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

26. Admitted.

27. Denied. At the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

28. Admitted.

29. Denied. At the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

30. Admitted.

31. Denied. At the time of inspection, certain vehicles were labeled “Em Star” and Keystone had previously filed a DBA conveying to Keystone the legal right to use the Em Star trade name as of February 24, 2014. PUC was notified of this

at the time of the inspection, but the field inspectors refused to accept the DBA as evidence that KQT was legally entitled to use the Em Star trade name. A copy of the DBA was subsequently sent by certified mail to Marybeth Osborne, Director of Regulatory Affairs, at PUC.

32. Admitted.

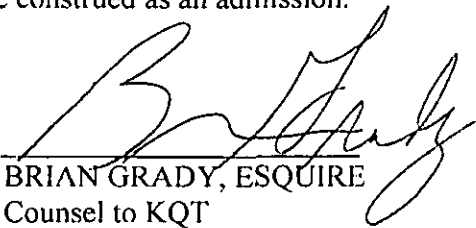
33. Denied. By way of further response, any deficiencies noted during any inspection were remedied immediately after the inspections occurred. Additionally, a corrective action plan was provided to Officer Joseph Ballard.

34. Denied. KQT has not reviewed the documentation before the Commission so is unable to confirm this statement as verified. By way of further response, KQT's policy is to run random driver's license checks on a spot basis on approximately 10% of its drivers. In addition, per KQT's employee handbook, drivers have an obligation to immediately self-report if their license is suspended. The employee in question did not self-report any license suspension. She went out on medical leave in February, 2014. Upon her return from medical leave in March, 2014, KQT became aware of the suspension and said employee was suspended from operating a vehicle until the license privileges were restored. She subsequently had her license renewed on March 18, 2014. By way of further response, KQT has approximately 130 drivers.

35. Denied. In the interest of resolving these matters, KQT has paid the fine indicated, but such payment is not to be construed as an admission.

36. Denied. In the interest of resolving these matters, KQT has paid the fine indicated, but such payment is not to be construed as an admission.

37. Denied. In the interest of resolving these matters, KQT has paid the fine indicated, but such payment is not to be construed as an admission.
38. Denied. In the interest of resolving these matters, KQT has paid the fine indicated, but such payment is not to be construed as an admission.
39. Denied. In the interest of resolving these matters, KQT has paid the fine indicated, but such payment is not to be construed as an admission.
40. Denied. In the interest of resolving these matters, KQT has paid the fine indicated, but such payment is not to be construed as an admission.
41. Denied. In the interest of resolving these matters, KQT has paid the fine indicated, but such payment is not to be construed as an admission.
42. Denied. In the interest of resolving these matters, KQT has paid the fine indicated, but such payment is not to be construed as an admission.

BY: 
BRIAN GRADY, ESQUIRE
Counsel to KQT

Date: January 9, 2015

ORIGIN ID:ESPA (610) 328-6646
KEYSTONE QUALITY TRANSPORT
MAILSOURCE INC.
491 BALTIMORE PIKE

SHIP DATE: 09JAN15
ACTWGT: 0.3 LB
CAD: 107042161/WSX12950

SPRINGFIELD, PA 19064
UNITED STATES US

BILL SENDER

TO PA PUBLIC UTILITY COMMISSION
ROSEMARY CHIAVETTA, SECRETARY
400 NORTH STREET
2ND FLOOR
HARRISBURG PA 17120

(610) 566-2200

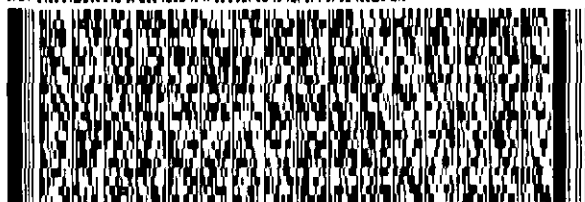
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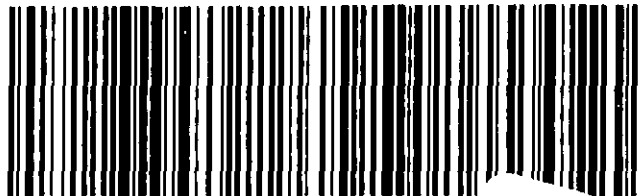
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