## B M Enterprises, Inc. TA A G TAXI

1167 Newport Mews Drive Bensalem, PA 19020 215-333-1111 215-333-3133-fax Academyradio@msn.com

January 30, 2015

RECEIVED

Commonwealth of Pennsylvania Pennsylvania Public Utility Commission (PUC) P.O. Box 3265 Harrisburg, PA 17105-3265 Attention: Rosemary Chiavetta, Secretary

### JAN 3 0 2015

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

#### Reference: Complaint, Docket NO. C-2015-2443890

Dear Mrs. Chiavetta:

In response to the notice of January 21, 2015, referencing the complaint that we received with allegations of miscellaneous advertisement violations, please see my response to each count below.

- Admitted in part, and denied in part. Our registered office for B M Enterprises, Inc is 1167 Newport Mews Dr, Bensalem, PA 19020, not 8125 Frankford Ave, Phila., PA 19136. Somewhere along the way one of the enforcement officer's changed our address without our knowledge or consent, as such I have refilled, with your office, a change of address fixing this issue. The Frankford Ave address is the location of the office of the dispatch company we use.
- 2. Admitted.
- 3. Denied. Further information and/or evidence are requested. Without further information and a copy of advertisement in question no further conclusion can be reached.
- 4. Denied. Same as response from answer 3 above.
- 5. Denied. How can a penalty be imposed without supporting evidence to the underlying allegation. We respectfully request a copy of said advertisement to make any further conclusions.
- 6. Denied. Same as response from answer 5 above.

Based on my response above, we deny any penalty imposed until said time we can be provided legible copies of any such advertisement that this complaint was based. I am either respectfully requesting a copy of the aforementioned advertisement in question or referred to herein and/or a hearing to properly evaluate said penalties and/or any further Commission action.

If you need any further information, please call me at 215-416-2012.

Sincerely,

d Colund m Edward M. Burkhardt

VP

cc: Wayne T. Scott, Prosecutor, PUC, Bureau of Investigation and Enforcement

#### VERIFICATION

I. Edward M. Burkhardt, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at any nearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 PA. C.S. 4904 relating to unsworn falsifications to authorities.

1/31/15 Date:

Amo Edward M. Burkhardt

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

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FROM:

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PA PUC PO BOX 3265 ATT: Rose many chinvetta, Secretary