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March 18, 2015

VIA ELECTRONIC FILING

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

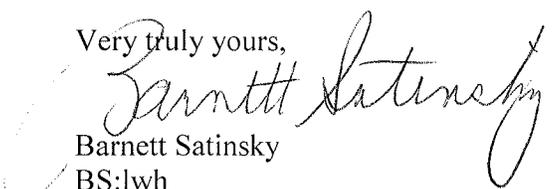
Re: Application of Granny's Helping Hands PA, Inc.
Docket Number: A-2014-2449185 (Amended)

Dear Secretary Chiavetta:

Enclosed for filing is Joint Protestants Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County Transport, Inc.'s Motion to Compel Applicant to Answer Joint Protestants' First Set of Interrogatories, a copy of which is being served on the Applicant.

Thank you for your cooperation.

Very truly yours,


Barnett Satinsky

BS:lwh

Enclosure

cc: Ms. Eloise Jay Jones (*President/Applicant*) (w/encl.)
(*via Certified Mail, Return Receipt Requested 7196 9008 9111 2280 3304*)
Charles E. Rainey, Jr., Chief Admin. Law Judge (w/encl.) (*via First Class Mail and email*)
Charles E. Thomas, III, Esquire (w/encl.) (*via e-Service: cet3@tntlawfirm.com*)
Christine Soares, Esquire (w/encl.) (*via email*)
Ms. Patricia Moir (w/encl.) (*via email*)
Mr. Samuel Valenza (w/encl.) (*via email*)
Mr. Mark E. Glatz (w/encl.) (*via email*)
Mr. James Tammaro (w/encl.) (*via email*)
Mr. James Raymond (w/encl.) (*via email*)

A Pennsylvania Limited Liability Partnership

California Colorado Connecticut Delaware District of Columbia
Florida Nevada New Jersey New York Pennsylvania

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF : DOCKET A-2014-2449185 (Amended)
GRANNY'S HELPING HANDS : (Electronically Filed)
PA, INC. :

SUBURBAN TRANSIT NETWORK, INC. T/A TRANSNET'S,
WILLOW GROVE YELLOW CAB CO., INC. T/D/B/A BUX-MONT
YELLOW CAB AND T/D/B/A BUX-MONT TRANSPORTATION
SERVICES CO.'S, EASTON COACH COMPANY T/A NORRISTOWN
TRANSPORTATION COMPANY'S, TRI COUNTY TRANSIT SERVICE, INC.'S
AND BUCKS COUNTY TRANSPORT, INC.'S MOTION TO COMPEL APPLICANT
GRANNY'S HELPING HANDS PA, INC., TO ANSWER JOINT PROTESTANTS'
FIRST SET OF INTERROGATORIES

Protestants Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County Transport, Inc. (jointly referred to herein as "Joint Protestants"), by their attorneys, file this Motion to Compel Answers to their First Set of Interrogatories Directed to Granny's Helping Hands PA, Inc., pursuant to 52 Pa. Code §§ 5.342, 5.371, and 5.372, the basis of which is as follows:

1. Applicant's name and docket number of the application:

Granny's Helping Hands PA, Inc.¹
(hereinafter referred to as "GHH" or "Applicant")
P. O. Box 725
Lansdowne, Delaware County, PA 19050

Docket number A-2014-2449185 (Amended)

¹ In various documents, Applicant is referred to as "Granny's Helping Hands PA Inc.", "Grannys Helping Hands PA, Inc.", "Granny's Helping Hands Pa Inc.", "Granny's Helping Hands PA. Inc.", and "Granny's Helping Hands Inc."

2. Names, business addresses and telephone numbers of the Joint Protestants:

- (a) Suburban Transit Network, Inc.
(hereinafter referred to as "TransNet")
980 Harvest Drive, Suite 100
Blue Bell, PA 19422
(215) 542-7433

- (b) Willow Grove Yellow Cab Co., Inc.
t/d/b/a Bux-Mont Yellow Cab and
t/d/b/a Bux-Mont Transportation Services Co.
(hereinafter referred to as "Bux-Mont")
701 Lincoln Avenue
Willow Grove, PA 19090
(215) 659-8865

- (c) Easton Coach Company
t/a Norristown Transportation Company
(hereinafter referred to as "ECC")
1200 Conroy Place
Easton, PA 18040
(610) 253-4055

- (d) Tri County Transit Service, Inc.
(hereinafter referred to as "Tri County")
110 Industrial Parkway
Sanatoga, PA 19464
(610) 495-5640

- (e) Bucks County Transport, Inc.
(hereinafter referred to as "BCT")
Buckingham Green II
P.O. Box 510
Holicong, PA 18928
(215) 794-5554

3. Names, business addresses, telephone and fax numbers and email addresses of Protestants' attorneys:

Barnett Satinsky, Esquire
Christine Soares, Esquire
Fox Rothschild LLP
2000 Market Street – 20th Floor
Philadelphia, PA 19103 - 3222
(215) 299-2088, 2864 (telephone)
(215) 299-2150 (fax)
bsatinsky@foxrothschild.com
csoares@foxrothschild.com

4. Name, business address, fax and telephone number of Applicant's attorney:

Unknown.

5. GHH filed with the Pennsylvania Public Utility Commission (the "Commission") an application for approval to begin to transport, as a common carrier, by motor vehicle, persons, in paratransit service, between points in the Counties of Bucks, Chester, Delaware, Montgomery and Philadelphia.

6. Notice of the application was published in the Pennsylvania Bulletin dated February 14, 2015.

7. Protests to the application were due on or before March 2, 2015.

8. Joint Protestants timely filed a joint protest to Applicant's application on February 17, 2015.

9. On February 18, 2015, Joint Protestants mailed GHH by certified mail, return receipt requested, their First Set of Interrogatories, attached hereto as Exhibit "A." Service was accepted on February 23, 2015; a copy of the signed return receipt is attached hereto as Exhibit "B."

10. Applicant's response to Joint Protestants' First Set of Interrogatories was due within 20 days of service of the request, or March 16, 2015.

11. Applicant has failed to provide answers to Joint Protestants' First Set of Interrogatories as of the date of this Motion.

WHEREFORE, Joint Protestants TransNet, Bux-Mont, ECC, Tri County, and BCT respectfully request an Order compelling Granny's Helping Hands PA, Inc., to immediately answer Joint Protestants' First Set of Interrogatories.

Respectfully submitted,


BARNETT SATINSKY, ESQUIRE
PA Attorney I.D. # 15767
CHRISTINE SOARES, ESQUIRE
PA Attorney I.D. # 203497
FOX ROTHSCHILD LLP
2000 Market Street, 20th Floor
Philadelphia, PA 19103-3222
215.299.2088, 2864 (phone)
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bsatinsky@foxrothschild.com
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Attorney for Joint Protestants
Suburban Transit Network, Inc. t/a TransNet,
Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont
Yellow Cab and t/d/b/a/ Bux-Mont Transportation
Services Co., Easton Coach Company t/a Norristown
Transportation Company, Tri County Transit Service, Inc.,
and Bucks County Transport, Inc.

March 18, 2015

CERTIFICATE OF SERVICE

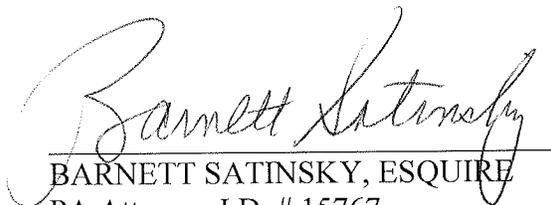
I hereby certify that I have on this day served a true copy of Joint Protestants Suburban Network Transit, Inc. t/a TransNet's, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co.'s, Easton Coach Company t/a Norristown Transportation Company's, Tri County Transit Service, Inc.'s, and Bucks County Transport, Inc.'s Motion to Compel Applicant Granny's Helping Hands PA, Inc., to Answer Joint Protestants' First Set of Interrogatories upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54 by the methods set forth below, postage prepaid.

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265
(By eFiling)

Charles E. Rainey, Jr., Chief Admin. Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265
(By First Class Mail, Postage Prepaid and email)

Eloise Jay Jones, President
Granny's Helping Hands PA, Inc.
P.O. Box 725
Lansdowne, PA 19050
(Applicant)
(By Certified Mail, Return Receipt Requested)

Charles E. Thomas, III, Esquire
Thomas, Niesen & Thomas, LLC
212 Locust Street, Suite 600
P.O. Box 9500
Harrisburg, PA 17108-9500
(Counsel for Rover Community Transportation, Inc.)
(By e-Service: cet3@tnlawfirm.com)



BARNETT SATINSKY, ESQUIRE
PA Attorney I.D. # 15767
CHRISTINE SOARES, ESQUIRE
PA Attorney I.D. # 203497
FOX ROTHSCHILD LLP
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215.299.2150 (fax)
bsatinsky@foxrothschild.com
csoares@foxrothschild.com

Attorney for Joint Protestants
Suburban Transit Network, Inc. t/a TransNet,
Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont
Yellow Cab and t/d/b/a/ Bux-Mont Transportation
Services Co., Easton Coach Company t/a Norristown
Transportation Company, Tri County Transit Service, Inc.,
and Bucks County Transport, Inc.

March 18, 2015

EXHIBIT "A"



Fox Rothschild LLP
ATTORNEYS AT LAW

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www.foxrothschild.com

Barnett Satinsky
Direct Dial: (215) 299-2088
Internet Address: bsatinsky@foxrothschild.com

February 18, 2015

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Eloise Jay Jones, President
Granny's Helping Hands PA, Inc.
P. O. Box 725
Lansdowne, PA 19050

Re: Application of Granny's Helping Hands PA, Inc.
Docket Number: A-2014-2449185 (Amended)

Dear Ms. Jones:

Enclosed with this letter please find the First Set of Interrogatories of Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County Transport, Inc., directed to Granny's Helping Hands PA, Inc., and issued pursuant to 52 Pa. Code § 5.321 *et seq.*

When answering each question, please be sure to indicate the name of the person responsible for answering the interrogatory or producing the documents. Also, please attach an affidavit or verification for each person. Answers to interrogatories are due in this office and address within twenty (20) days.

Should you have any questions regarding these Interrogatories, please contact me at (215) 299-2088.

Very truly yours,

Barnett Satinsky
BS:lwh
Enclosure

cc: Christine Soares, Esquire (w/encl.) *(via email)*
Ms. Patricia Moir (w/encl.) *(via email)*
Mr. Samuel Valenza (w/encl.) *(via email)*
Mr. Mark E. Glatz (w/encl.) *(via email)*
Mr. James Tammaro (w/encl.) *(via email)*
Mr. James Raymond (w/encl.) *(via email)*

A Pennsylvania Limited Liability Partnership

California Colorado Connecticut Delaware District of Columbia
Florida Nevada New Jersey New York Pennsylvania



U.S. Postal Service
CERTIFIED MAIL

<i>package id</i> 00238013	<i>from</i> Barnett Satinsky (0066) FoxRothschild 2000 Market Street FL 20 Philadelphia , PA 19103 U	<i>vendor</i> Certified Mail
<i>ship date</i> Wed, Feb 18 2015		<i>tracking number</i> CERT00238013
<i>to</i> Eloise Jay Jones Granny's Helping Hands PA, Inc. P.O. Box 725 Lansdowne , PA 19050 US 215-299-2118	<i>billing</i> SUBURBAN TRANSIT NET...NSNET.MONITOR PUC APPLICATIONS (087992.00009)	<i>service</i> USPS Certified Mail™
<i>residential address</i> No	<i>operator</i> Mary Oreo 215-299-2089 moreo@foxrothschild.com	<i>options</i> Return Receipt
<i>return label</i> No	<i>create time</i> 02/18/15, 10:29AM	<i>courtesy quote</i> .00 USD <i>There is no value to display until a cost is entered in the mailroom</i> <i>The courtesy quote does not reflect fuel surcharge and does not necessarily reflec all accessorial charges.</i>

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Certified Article Number
7196 9008 9111 6893 7476
SENDERS RECORD

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE: APPLICATION OF : **DOCKET A-2014-2449185 (Amended)**
GRANNY'S HELPING HANDS :
PA, INC. :

JOINT PROTESTANTS

SUBURBAN TRANSIT NETWORK, INC. T/A TRANSNET'S, WILLOW GROVE YELLOW CAB CO., INC. T/D/B/A BUX-MONT YELLOW CAB AND T/D/B/A BUX-MONT TRANSPORTATION SERVICES CO.'S, EASTON COACH COMPANY T/A NORRISTOWN TRANSPORTATION COMPANY'S, TRI COUNTY TRANSIT SERVICE, INC.'S AND BUCKS COUNTY TRANSPORT, INC.'S FIRST SET OF INTERROGATORIES DIRECTED TO GRANNY'S HELPING HANDS PA, INC.

Pursuant to the provisions of section 333(d) of the Public Utility Code, 66 Pa. C.S.A. § 333(d), Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County Transport, Inc. (hereinafter collectively referred to as "Joint Protestants"), by their attorneys, submit and propound the following Interrogatories to Granny's Helping Hands PA, Inc. The Interrogatories are to be answered separately and fully in writing, under oath, WITHIN 20 DAYS of service hereof, pursuant to 52 Pa. Code § 5.342(d).

These Interrogatories are continuing, and any information secured or discovered subsequent to the filing of your answers is to be supplied by supplemental answers.

I. DEFINITIONS

1. "Applicant" or "GHH" means applicant, Granny's Helping Hands PA, Inc.
2. "You," "Your" or "Applicant" means applicant unless otherwise noted, including but not limited to any divisions, departments, subsidiaries, affiliates, predecessors, present or former officers, directors, shareholders, owners, supervisors, managers, employees, servants, workmen, representatives or agents of each entity and all other persons acting or purporting to act on behalf of each entity and all other persons acting or purporting to act on behalf of each such entity or person.
3. The term "documents" means all writings of any kind including the originals of all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise (including without limitation), correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, inter-office and intra-office communications, offers, notations of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes,

telefax, invoices, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing, graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, records, motion pictures) and electronic, mechanical or electric records or representations of any kind (including without limitation, tapes, cassettes, discs, recordings).

4. The term "all documents" means every document as above defined known to you and every such document that can be located or discovered by reasonably diligent efforts.

5. The phrase "within the scope of this application" refers to the authority as sought in the application to the Pennsylvania Public Utility Commission as shown in the Pennsylvania Bulletin published in this proceeding.

6. The term "identify" or "identification," when used in reference to an individual person, means to state his full name, his present or last known address, his present or last known position and business affiliation, and his position or affiliation with any party herein at any relevant time.

7. The term "identify," when used in reference to a corporation, partnership, or other business entity, means to state its full name and address, and, in the case of a corporation, the state of incorporation and the address of its principal place of business.

8. The word "identify" when used in reference to a document means to:

- (i) State the date, author, recipient, and type of document (e.g., invoice, delivery receipt, etc.) or some other means of distinguishing the document);
- (ii) Set forth or attach to the answer a true copy of the document;
- (iii) Identify each person who prepared the document;
- (iv) Identify each person who participated in the preparation of the document;
- (v) State the present location of the document; and
- (vi) Identify each person having custody or control of the document.

9. The term "identify" when used in reference to an oral communication means to:

- (i) State the date, place or places, and parties to the oral Communication or some other means of identifying the oral communication;

- (ii) Set forth the substance of the oral communication;
- (iii) State the medium through which the oral communication was made (e.g., in person or by telephone);
- (iv) Identify each person who participated in the oral communication;
- (v) Identify each person hearing the oral communication;
- (vi) State whether any written note or memorandum of the oral communication was made and, if so, identify the written note or memorandum in the manner required to identify a document by definition # 8 above.

10. "Person" or "persons" means all individuals and entities, including, without limitation, individuals, representative persons, associations, companies, corporations, partnerships, limited partnerships, joint ventures, trusts, estates, public agencies, departments, divisions, bureaus and boards.

11. "Affiliation" means wherein the deponent owns any stock in another entity, holds an office in another entity, holds a position of management in another entity or has a financial interest in another entity.

12. All words of masculine gender shall include the feminine gender thereof and the singular shall include the plural.

II. INSTRUCTIONS

In answering each Interrogatory:

1. Identify each document and oral communication that forms the basis in whole or in part for each answer or that corroborates the answer or the substance thereof, stating separately each item required by definitions # 8 and # 9 above.

2. State whether the information furnished is within the personal knowledge of the Applicant and, if not, identify each person (if known) to whom the information is a matter of personal knowledge.

3. If the answer to an Interrogatory is not presently known to the Applicant, so state and, in addition, respond to the Interrogatory within ten (10) days after the date on which such answer becomes known to the Applicant.

III. INTERROGATORIES

1. Identify the owner(s), officer(s), director(s) and/or shareholders of Granny's Helping Hands PA, Inc. For each, provide the following.

(a) Percentage of ownership interest;

(b) Position(s) held.

2. Since January 1, 2005, has any officer, director or shareholder of Applicant been convicted of a felony? If so describe:

(a) the nature of the crime;

(b) the date of sentencing and the sentence imposed.

3. What experience do you have in the business of transportation of passengers by motor vehicle?

4. Does/do the owner(s), officer(s), director(s) and/or shareholder(s) of Applicant currently possess any interest, financial or otherwise, and/or been involved in the operations of any other entity, wherever located, which transported passengers for compensation? If so, please provide:

(a) the name and address of the entity;

(b) the principal business of the entity (i.e., taxicab, limousine, paratransit, etc.);

(c) a description of the service territory of the entity;

(d) the name of each individual who possesses the interest or involvement in the entity, as well as the nature and extent of the interest and the duties of that individual; and

(e) all orders, certificates, or other evidence of approval from any governmental agency.

5. What type of transportation, if any, does Applicant currently render in

(a) interstate commerce (give percentage of total transportation revenue)?

(b) Pennsylvania intrastate commerce (give percentage of total transportation revenue)?

6. Has Applicant transported within the past three (3) years passengers in Pennsylvania intrastate transportation, either directly or indirectly? If so, please explain and identify the type of service provided.

7. Identify all locations from which the Applicant renders or intends to render intrastate transportation service.

8. Identify and attach copies of the authority and/or tariffs for paratransit rights requested from, or granted to, Applicant by the Pennsylvania Public Utility Commission, if any.

9. Has the Applicant or any of its officers, shareholders or directors ever been the subject of any complaint to the Pennsylvania Public Utility Commission, the Federal Motor Carrier Safety Administration or any other state or federal regulatory or governmental agency? If so, please state,

- (a) when the complaint occurred;
- (b) the identity of the complainant;
- (c) the nature of the complaint;
- (d) the final disposition of the complaint; and
- (e) produce copies of the complaint and any final order or settlement resolving the complaint.

10. Provide copies of any agreements, contracts and leases and/or licensing agreements Applicant has or has had with any other transportation provider or supplier.

11. Describe any business in which Applicant and each of its officers, shareholders and directors is engaged, other than the paratransit business.

12. Identify by name and address the accountant of Applicant and any other persons responsible for auditing and/or maintaining financial records of Applicant.

13. Identify all persons who are employed by Applicant and who are expected to testify on behalf of Applicant, and give a summary of his/her expected testimony.

14. Identify all persons who are expected to testify on behalf of Applicant as supporting witnesses and give a summary of their expected testimony as well as the name and address of any organization they are representing.

15. State for each supporting witness you named in Interrogatory # 14, the following:

- (a) the number of trips you intend to provide for each witness;
- (b) the frequency of trips (each day, week, month, year);
- (c) the origin and destination points;
- (d) the transportation service now being used by each witness;
- (e) any special needs of witness;

(f) whether the service of any carrier presently being used by the supporting witness will be terminated or curtailed upon you becoming a certified carrier. If so, give the name of the carrier and how much revenue it will lose.

16. Set forth a list of all vehicles now owned, leased or controlled by Applicant, and identify with respect to each:

- (a) the year, make, model and mileage;
- (b) the price and the date when the vehicle was acquired by Applicant;
- (c) the identity of the lessor for each vehicle, if any, and, if applicable, the date, duration and method of financing of the lease;
- (d) the seating capacity;
- (e) the license plate number and vehicle identification number; and
- (f) the air-conditioning, wheelchair capability, and any other features.

17. With respect to each of the vehicles you identified in your answer to Interrogatory # 16 above, describe any special equipment, e.g., wheelchair lifts, life support systems, medical emergency systems, emergency lighting equipment, installed or to be installed.

18. Identify the vehicles Applicant proposes to use if the application for certificate of authority is granted, and state the following:

- (a) the year, make and model;
- (b) the price and the date when the vehicle was acquired by Applicant;
- (c) the identity of the lessor for each vehicle, if any, and, if applicable, the date, duration and method of financing of the lease;
- (d) the seating capacity;
- (e) the license plate number and vehicle identification number; and
- (f) the air-conditioning, wheelchair capability, and any other features.

19. Please describe the method to be utilized to dispatch vehicles.

20. Describe each office, garage or other location owned or operated by Applicant, as well as each proposed office, garage or other location, and describe the vehicle maintenance, dispatch office and other facilities at each.

21. Have any vehicles operated in Applicant's current business been involved in a reportable accident any at time from 2007 to the present? If so, provide the details as to each such accident.

22. Describe any special qualifications or licenses that will be required of drivers providing the proposed service.

23. Explain how Applicant will ensure that a driver's license has not been revoked.

24. Has Applicant, or any of its drivers, agents, servants, employees, or independent contractors, been convicted of a violation of the Motor Vehicle Code of any state while operating a vehicle, between January 1, 2008 and the date of the responses to these Interrogatories? If so, provide the details of each such violation, including date, case number, offense, and fine or other disposition of the case.

25. Identify each employee employed by Applicant as of the time of your response hereto, including his or her job titles (i.e., drivers, maintenance, dispatch, etc).

26. Identify the independent contractors or other non-employees who perform services for Applicant, the nature of their job(s) and how often on average each works for you.

27. Identify any written or oral contracts or understandings, and produce copies of any written contract or understanding, Applicant has to provide transportation service or related service to or from the below-listed entities in the Counties of Bucks, Chester, Delaware, Montgomery and Philadelphia. If said contracts or understandings are oral in nature, describe the agreement, including, but not limited to, the duration of the agreement, the fees to be paid, and the nature of the transportation services provided.

- (a) hospitals;
- (b) other healthcare institutions;
- (c) any private organization;
- (d) any agency of the Commonwealth of Pennsylvania; and
- (e) any public organization.

28. Furnish Joint Protestants with:

- (a) your latest balance sheet and profit and loss statement;
- (b) the present application you filed with the Pennsylvania Public Utility Commission;
- (c) any other papers filed by you with the Pennsylvania Public Utility Commission;
- (d) a rate schedule or description of the money charges you intend to impose for the transportation services you intend to perform;
- (e) any and all documents that set forth safety procedures to be used by Applicant;

(f) a description of any existing or proposed maintenance policies;

(g) a description of any subsidy by a government agency (federal, state or local) which you expect to receive for your transportation and the amount of such existing or expected subsidy; and

(h) a copy of Applicant's Bylaws.

29. Furnish copies of all advertising published, distributed, circulated or performed by Applicant including, but not limited to, brochures, yellow pages, newspapers, flyers, web pages and direct mail.

30. (a) Do you intend to utilize the first full day of hearing assigned?

(b) Do you intend to utilize more than the first full day of hearing assigned?

(c) Identify each witness not previously identified in Responses to Interrogatory # 13 and Interrogatory # 14 you expect to call at the hearing of this matter.

31. Has the Applicant, or any individual associated with Applicant (whether by employment, ownership, or otherwise), either directly or indirectly sought operating rights from the Pennsylvania Public Utility Commission within the past three (3) years? If so, identify the name of the applicant, PUC docket number, and disposition or current status of such application.

32. State whether, at any time since January 1, 2008, Applicant has received a notice of cancellation or revocation concerning any insurance policy of Applicant. If so, describe the notice and/or circumstances surrounding any revocation.

33. Please describe in detail all studies, analyses, projections and/or forecasts Applicant has prepared or had prepared on its behalf with respect to expected traffic, revenues, expenses and profit to be generated in the future by the proposed service in the area covered by this application. Provide copies of all such studies, analyses, projections and/or forecasts.

34. Has the Applicant ever had a certificate of operating authority suspended or revoked by the Pennsylvania Public Utility Commission? If so, please state:

- (a) when the suspension or revocation occurred;
- (b) the reason for the suspension or revocation;
- (c) the final disposition of the suspension or revocation; and
- (d) produce copies of the suspension or revocation notice and any final order or settlement resolving the suspension or revocation.

35. Has the Applicant ever rendered paratransit service in a territory for which it did not hold a certificate of paratransit operating authority? If so, please state:

- (a) the date, time and place of such authorized or unauthorized service, including the place or origin and place of ending the trip;

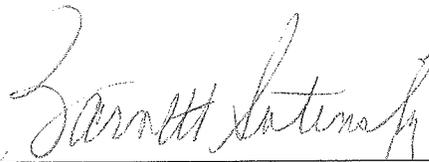
(b) the identity of the rider;

(c) produce copies of the log books which reflect such authorized and/or unauthorized service; and

(d) specify the amount of compensation paid for the service rendered.

36. Provide a copy of each document Applicant proposes to introduce as an exhibit in the hearing of this case.

37. Identify by name, title, and address all persons who have supplied information used in answering the foregoing interrogatories and identify, for each person involved, the specific interrogatory, or interrogatories, for which they supplied information.



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CHRISTINE SOARES, ESQUIRE.
PA Attorney I.D. # 203497
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215.299.2150 (fax)
bsatinsky@foxrothschild.com
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Attorneys for Joint Protestants
Suburban Transit Network, Inc. t/a TransNet,
Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-
Mont Yellow Cab and t/d/b/a Bux-Mont
Transportation Services Co., Easton Coach
Company t/a Norristown Transportation Company,
Tri County Transit Service, Inc., and Bucks County
Transport, Inc.

DATED: February 18, 2015

VERIFICATION

Granny's Helping Hands PA, Inc., by its duly authorized officer, states that it is familiar with the information set forth in the foregoing Answers to Interrogatories, and that such Answers are true and correct to the best of its knowledge, information and belief.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C. S. § 4904 relating to unsworn falsification to authorities.

GRANNY'S HELPING HANDS PA, INC.

By: _____

Title

DATED:

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

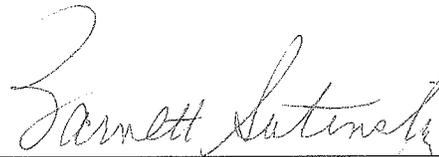
IN RE: APPLICATION OF : **DOCKET A-2014-2449185 (Amended)**
GRANNY'S HELPING HANDS : **(Electronically Filed)**
PA, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have this 18th day of February, 2015, served true copies of the First Set of Interrogatories of Joint Protestants Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County Transport, Inc. Directed To Granny's Helping Hands PA, Inc., upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265
(By eFiling)
(Certificate of Service only)

Eloise Jay Jones, President
Granny's Helping Hands PA, Inc.
P.O. Box 725
Lansdowne, PA 19050
(Applicant)
(By Certified Mail, Return Receipt Requested)



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Co., Easton Coach Company t/a Norristown Transportation
Company, Tri County Transit Service, Inc., and Bucks
County Transport, Inc.



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Internet Address: bsatinsky@foxrothschild.com

February 18, 2015

VIA ELECTRONIC FILING

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

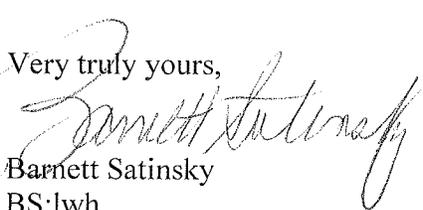
Re: Application of Granny's Helping Hands PA, Inc.
Docket Number: A-2014-2449185 (Amended)

Dear Secretary Chiavetta:

Enclosed for filing is the Certificate of Service pertaining to service of the First Set of Interrogatories of Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County Transport, Inc., upon the Applicant in the above matter.

Thank you for your cooperation.

Very truly yours,


Barnett Satinsky

BS:lwh

Enclosure

cc: Eloise Jay Jones (*President/Applicant*) (w/encl.)
(*via Certified Mail, Return Receipt Requested No. 7196 9008 9111 6893 7476*)
Christine Soares, Esquire (w/encl.) (*via email*)
Ms. Patricia Moir (w/encl.) (*via email*)
Mr. Samuel Valenza (w/encl.) (*via email*)
Mr. Mark E. Glatz (w/encl.) (*via email*)
Mr. James Tammaro (w/encl.) (*via email*)
Mr. James Raymond (w/encl.) (*via email*)

A Pennsylvania Limited Liability Partnership

California Colorado Connecticut Delaware District of Columbia
Florida Nevada New Jersey New York Pennsylvania

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

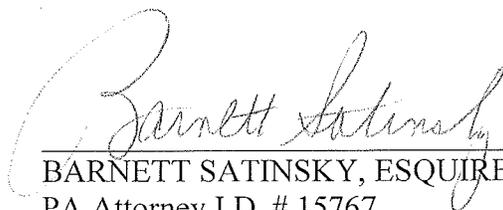
IN RE: APPLICATION OF : **DOCKET A-2014-2449185 (Amended)**
GRANNY'S HELPING HANDS : **(Electronically Filed)**
PA, INC.

CERTIFICATE OF SERVICE

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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265
(By eFiling)
(Certificate of Service only)

Eloise Jay Jones, President
Granny's Helping Hands PA, Inc.
P.O. Box 725
Lansdowne, PA 19050
(Applicant)
(By Certified Mail, Return Receipt Requested)

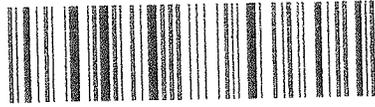


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Yellow Cab and t/d/b/a Bux-Mont Transportation Services
Co., Easton Coach Company t/a Norristown Transportation
Company, Tri County Transit Service, Inc., and Bucks
County Transport, Inc.

EXHIBIT "B"

2. Article Number



7196 9008 9111 6893 7476

3. Service Type **CERTIFIED MAIL™**

4. Restricted Delivery? (Extra Fee) Yes

1. Article Addressed to:

Eloise Jay Jones
Granny's Helping Hands PA, Inc.
P.O. Box 725
Lansdowne, PA 19050
US

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

2-23-15

C. Signature

X

Agent
 Addressee

D. Is delivery address different from item 1?
If YES, enter delivery address below:

Yes
 No

087992 00009-0065 -



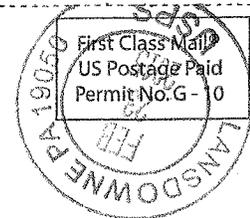
CERT00238013

PS Form 3811, January 2005

Domestic Return Receipt

UNITED STATES POSTAL SERVICE®

PRINT YOUR NAME, ADDRESS AND ZIP CODE™ BELOW



FOX ROTHSCHILD LLP
ATTN: *Berrett Satinsky, Esq.*
2000 MARKET STREET 20TH FLOOR
PHILADELPHIA PA 19103-3222