

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	DOCKET NO: C-2015-2468908
BUREAU OF INVESTIGATION AND ENFORCEMENT	:	
	:	
v.	:	
	:	
QRST2, LLC t/a	:	
QUICK RESPONSE MEDICAL TRANSPORT	:	
41 East Front Street	:	
Media, PA 19063	:	

ANSWER TO COMPLAINT WITH NEW MATTER

AND NOW, comes QRST2, LLC t/a Quick Response Medical Transportation, through it's counsel Robert H. Holber, Esquire, and files this Answer To Complaint With New Matter and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted and Denied. It is admitted that Respondent has failed to maintain evidence of liability insurance on file with the Commission. It is denied the Bureau of Investigation and Enforcement's proposed civil penalty for this violation is \$500 and cancellation of the Certificate of Public Convenience.

5. Denied. Sections of the Public Utility Code relied upon by the Bureau of Investigation And Enforcement do not explicitly provide that evidence of insurance violates said sections.

NEW MATTER

6. Respondent has not operated under its license since it allowed its insurance to lapse.
7. Respondent does not intend to operate under its license until and unless it provides proof

of proper insurance to the Pennsylvania Public Utility Commission.

8. Respondent is not aware of any notice that provided that it with the knowledge that it had to keep evidence of insurance with the Commission if it was temporarily going to stop doing business.

9. Respondent had and has no intent of violating any regulation, code, or statute.



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Robert H. Holber, Esquire  
Law Office of Robert H. Holber, P.C.  
41 East Front Street  
Media, PA 19063  
(610) 565-5463

Counsel for Respondent

VERIFICATION

I, Eugene Gittelman, verify that the statements made in the foregoing Answer to Complaint With New Matter are true and correct to the best of my knowledge, information, and belief. I understand that the statements made are subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Dated: 3/23/2015

Eugene Gittelman  
Eugene Gittelman