

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of East Coast Resources, LLC :
: Commission Docket No.
: A-2014-24533

**PROTEST OF
United Cab, LLC**

United Cab, LLC. (“United”), hereby files this protest to the Application of East Coast Resources, LLC (“Applicant”) for the right to begin to transport, by motor vehicle, persons in the experimental service of ride-sharing network for passenger trips, from points in Cumberland, Dauphin, Lancaster, Lebanon and York Counties, to points in Pennsylvania and return. United respectfully requests that this Commission deny the application for the reasons set forth below.

1. The name and business address of United are:

United Cab, LLC.
2304 Walnut Street
Harrisburg PA 17103

2. The name and address and telephone number of Protestant's attorney is:

Justine L. Pate, Esq.
620 S. 13th Street
Harrisburg, PA, 17104
(347) 351 – 2631

3. Applicant possess operating authority at A-2012-2176038. Protestant's operating authority is attached hereto as Exhibit A.
4. Applicant has not attached to its application: a balance sheet, projected revenue and expense statement, or any other financial information that is indicative of its financial fitness to

provide the proposed service in this area. Accordingly, United believes and therefore avers that Applicant does not possess the requisite financial fitness to provide the proposed service.

5. Applicant has attached no information to its application that would indicate how Applicant intends to operate. Accordingly, United believes and therefore avers that Applicant does not possess the requisite technical fitness to provide the proposed service in such huge area.

6. Approval of this application will not serve a useful public purpose or need, but will duplicate already existing service to the detriment of existing carriers.

7. There is no need for the proposed service.

8. It would authorize additional unnecessary and harmful competition into the area with the resulting loss of revenue to United and be detrimental to the traveling public.

9. Applicant is simply making an application for regular taxi service, under the guise of 'experimental service of ride-sharing networks'. Its description of services is that applicant will pick up and transport persons, making applicant a taxi company. As such, applicant has filed the incorrect application before the Public Utility Commission.

WHEREFORE, Protestant, United Cab, LLC respectfully requests that this Honorable Commission deny the application of East Coast Resources, LLC.

Dated: April 15, 2015

 Justine L. Pate, Esq.

Representing United Cab LLC, Good Cab LLC, EZ Taxi LLC, and Keystone Cab, Inc.
620 S. 13th Street
Harrisburg, PA 17104
(347) 351-2631

EXHIBIT A

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

IN THE MATTER OF: A-6412947

United Cab, LLC for the right to begin to transport, as a common carrier, by motor vehicle, persons upon call or demand in the city of Harrisburg and within an airline distance of ten (10) statute miles of the limits of said city. A-2012-2176038

EFFECTIVE DATE: July 20, 2012

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval to operate.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 4th day of January, 2013.

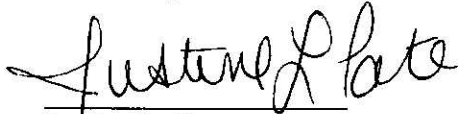


Secretary

CERTIFICATE OF SERVICE

I, Justine L. Pate, Esq. hereby certify that on this date I placed a true and correct copy of the foregoing document in the United States Mail, postage prepaid, addressed to the following individual(s)

Steven K. Haas, Esq.
100 North 10th Street
Harrisburg, PA 17101



Justine L. Pate

4/2/15
Date