

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In Re: :
East Coast Resources, LLC :
140 South 17th Street :
Harrisburg, PA 17104 :
: A-2014-2453533

CAPITAL CITY CAB'S OFFICIAL PROTEST

Capital City Cab Service (Capital City), through their attorney Joseph T. Sucec, Esq., hereby files an Official Protest in the above matter, as follows.

1 Protestant's mailing address is:

Capital City Cab Service
362 South Front Street
Steelton, PA 17113
(717)939-6363

2 The mailing address of Protestant's Counsel is:

Joseph T. Sucec, Esq.
325 Peach Glen-Idaville Road
Gardners, PA 17324
(717)315-2359

3 Protestant's authority is at Commission Docket Number A-00113875; the relevant documents are attached to this filing (see Attached Exhibits)

4 The present Application fails for the following reasons:

A Applicant is seeking coverage in three counties served by Protestant: Cumberland, Dauphin, and Perry.

There is no need for the service in Protestant's coverage area. The Harrisburg market is saturated with at least four companies: Capital City, Keystone Taxi, Harrisburg City Cab (located at the same address as Applicant), and AAAA Alpine. Further, there is no record on the part of Capital City regarding failure to provide safe and/or adequate service.

B Applicant has demonstrated neither the technical nor business acumen to

operate in the public necessity and convenience of the public. (Note: while Applicant is located at the same address as a Certificate carrier, no attempt is made by Applicant to make any sort of connection between the two)

C Applicant's proposed service would adversely affect the existing companies, including Protestant, in Protestant's coverage area.

5 If Applicant is allowed to operate on any basis, in Protestant's coverage area, Protestant will be adversely affected; Protestant submits that there is no curative Amendment that can solve this problem.

WHEREFORE, Capital City Cab Service respectfully prays that the present Application be Dismissed with Prejudice.

Respectfully submitted,

Date: 4/6/2015

/s/ Joseph T. Sucec, Esq.

Joseph T. Sucec, Esq.
Attorney for Capital City Cab Service
325 Peach Glen-Idaville Road
Gardners, PA 17324
(717)315-2359
joesucec@comcast.net

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In Re: :
East Coast Resources, LLC :
140 South 17th Street :
Harrisburg, PA 17104 :
: A-2014-2453533

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of Capital City Cab Service's Protest in the above matter by first-class mail on the following:

Steven K. Haas, Esq.
100 North Tenth Street
Harrisburg, PA 17101
(listed counsel for Applicant)

Date: 4/6/2015

/s/ Joseph T. Sucec, Esq.
