

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
BUREAU OF INVESTIGATION AND ENFORCEMENT	:	
v	:	C-2015-2462735
CAPITAL CITY CAB SERVICE	:	
362 SOUTH FRONT STREET	:	
STEELTON, PA 17113	:	

ANSWER TO COMPLAINT

Capital City Cab Service, through its attorney Joseph T. Sucec, Esq., hereby responds to the formal Complaint filed by the Complainant as follows:

1 Admitted

2 Admitted

3 Denied. In fact, El-Jabbari estimated Ms. Fontroy a price of “about \$6.00” (SIX DOLLARS) for the trip in question. This is a fair and reasonable approximation (requested by Ms. Fontroy) of the actual rate between the two points in question. In addition, there was no refusal of service. Therefore, both of the alleged violations are Denied.

4 Denied on both counts. Capital City Cab Service submits that there was no violation of the 52 Pa. Code 29.313(a), therefore no fine should be assessed.

WHEREFORE, Capital City Cab Service respectfully requests that the above Complaint be dismissed, with no fine assessed at the above Docket.

Respectfully submitted,

4/20/15

/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

VERIFICATION

As a representative of the corporate Respondent in the above-stated matter, I hereby verify that the facts stated in the foregoing Answer are true and correct. I understand that false statements herein are made subject to the penalties of 18 PA. CS 4904, regarding unsworn falsification to authorities.

Date: 4/20/15

/s/ Ayal Salame

Ayal Salame, Owner/ President, Capital City

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CERTIFICATE OF SERVICE

I hereby certify that service was affected of the ANSWER TO COMPLAINT in this matter on the following:

Rosemary Chiavetta
Pennsylvania PUC
PO Box 3265
Harrisburg, PA 17105 (first-class mail)

Wayne T. Scott, Prosecutor
Bureau of Investigation and Enforcement
Pennsylvania PUC
PO Box 3265
Harrisburg, PA 17105 (e-mail)

4/20/15

/s/ Joseph T. Sucec, Esq.

Joseph T. Sucec, Esq.