

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Fabian Transportation, Inc.

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Commission Docket No.  
A-2015-2471761

**PROTEST OF  
United Cab, LLC**

United Cab, LLC (United) hereby files this protest to the Application of Fabian Transportation, Inc., for the right to transport, persons in airport transportation service, from points in Lebanon County to the Harrisburg International Airport, Lehigh Valley International Airport, and Philadelphia International Airport. 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 of Protestant's attorney is:

Justine L. Pate, Esq.

620 S. 13<sup>th</sup> Street

Harrisburg, PA 17104

3. Protestant possesses authority at A-6412947. 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.

WHEREFORE, Protestant, United Cab, LLC respectfully requests that this Honorable Commission deny the application of Fabian Transportation, LLC.

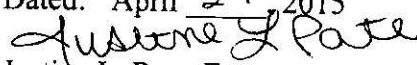
Dated: April 24, 2015  
  
Justine L. Pate, Esq.  
620 S. 13<sup>th</sup> Street  
Harrisburg, PA 17104

EXHIBIT A

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION

IN THE MATTER OF: A-6412947

*United Cab, LLC for the right 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 4<sup>th</sup> day of January, 2013.

  
Secretary

## Certificate of Service

I hereby certify that I served the foregoing Protest by placing a true and correct copy thereof in the United States Mail, first class postage prepaid, addressed as follows:

**Fabian Transportation, Inc.**

**444 North 11<sup>th</sup> Street**

**Lebanon, PA 17046**

Dated: 4/24/15

Justine J. Pate