

LAW OFFICES OF
STEPHEN G. WELZ
A PROFESSIONAL CORPORATION

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WYOMISSING, PENNSYLVANIA 19610-1254

TELEPHONE (610) 378-5272
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April 17, 2015

Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17120

Re: Protest of Reading Checker Cab, Inc.
To Application of Dominicana Taxi Express, LLC
A-2015-2471494


Dear Sir or Madam:

Please accept this letter as my entry of appearance on behalf of Reading Checker Cab, Inc. Enclosed for filing are two copies of the Protest of Reading Checker Cab, Inc. to the Application of Dominicana Taxi Express, LLC for call or demand service, which I am filing on behalf of my client.

By way of copy of this letter and enclosure, a copy of this Protest is being served upon the Applicant.

Very truly yours,

LAW OFFICES OF STEPHEN G. WELZ, P.C.


Stephen G. Welz

Enclosures
SGW/alw
Cc: Dominicana Taxi Express, LLC (w/enclosure)

RECEIVED
2015 APR 21 AM 12:46
PA P.U.C.
SECRETARY'S BUREAU

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2015 APR 21 AM 12:46
PA P.U.C.
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: A-2015-2471494
Dominicana Taxi Express, LLC (1313 Moss Street, Reading, Berks County, PA 19604)
for Approval to Begin Operating as Common Carriers for Transportation in call or
demand service, in the City of Reading, Berks County.

Pennsylvania Bulletin Reference: April 10, 2015
45 Pa.B. 1917

PROTEST OF
READING CHECKER CAB, INC.
A.00121381

1. The name, address and telephone number of Protestant is:

Reading Checker Cab, Inc.
615 Elm Street
Reading, PA 19601
Telephone: 610-373-8666

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

Stephen G. Welz, Esquire
LAW OFFICES OF STEPHEN G. WELZ, P.C.
999 Berkshire Blvd., Suite 290
Wyomissing, PA 19610-1254
Telephone: 610-378-5272

3. Protestant possesses authority of A.00121381, summary attached as Exhibit "A";

Under these rights, Protestant has been for many years providing full service, which is identical to the service which Applicant seeks to provide to, from and between points in the County of Berks.

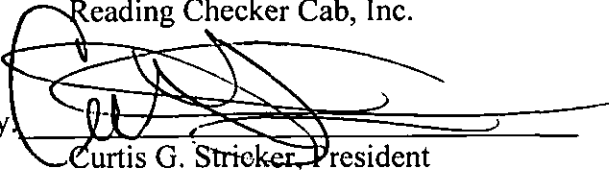
The subject area is already served by six licensees plus unauthorized carriers, and there is no need for additional service.

4. Without knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be prepared. In addition, Protestant requires additional information regarding applicant's fitness, financially and otherwise.
5. Protestant holds out to perform and does perform an adequate and satisfactory service, and diversion of its revenue would be extremely adverse to this Protestant, and would be adverse to call and demand service presently being rendered in Berks County.
6. Protestant knows of no amendment which will satisfy its interests in this proceeding.
7. Absent an appropriate amendment and pursuant to Section 333 (c) of the Public Utility Law, Protestant requests that Applicant furnish it and its counsel a list of the names and addresses of all witnesses Applicant intends to call.

Absent an appropriate amendment, Protestant prays the application may be dismissed.

AND IT WILL EVER PRAY.

DATED: April 17, 2015

Reading Checker Cab, Inc.
By: 
Curtis G. Stricker, President

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of DOMINICANA TAXI EXPRESS, :
LLC (1313 Moss Street, Reading, Berks County, :
PA 19604) in call or demand service, in the City of : A-2015-2471494
Reading, Berks County :

CERTIFICATE OF SERVICE

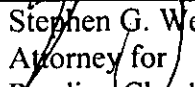
I HEREBY CERTIFY that I have this date served a true and correct copy of the foregoing Protest of Reading Checker Cab, Inc. to the Application of DOMINICANA TAXI EXPRESS, LLC, in accordance with the requirements of Subsection 1.54, by regular U.S. Mail, as follows:

Dominicana Taxi Express, LLC
1313 Moss Street
Reading, PA 19604

LAW OFFICES OF STEPHEN G. WELZ, P.C.

DATED: April 17, 2015

By: _____


Stephen G. Welz, Esquire
Attorney for
Reading Checker Cab, Inc.
Attorney ID 23280

RECEIVED
2015 APR 21 AM 12:47
PA P.U.C. BUREAU
SECRETARY'S BUREAU

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2015 APR 21 AM 12:47
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SECRETARY'S BUREAU

"Exhibit A"

COPY

Certificate No. A.00121381

Call and Demand PA PUC No. 2

Cancels

Call and Demand PA PUC No. 1

READING CHECKER CAB, INC.

RATES AND RULES
GOVERNING THE
TRANSPORTATION OF PERSONS

OPERATING AUTHORITY:

To transport, as a common carrier, persons
upon call or demand, in the County of Berks.

ISSUED June 18, 2007

EFFECTIVE: July 18, 2007

By: Curtis G. Stricker, President
615 Elm Street
Reading, Pennsylvania 19601
(610) 373-8666
(610) 374-5111

(1)

EXHIBIT A



LAW OFFICES OF
STEPHEN G. WELZ, P.C.
999 BERKSHIRE BOULEVARD, SUITE 290
WYOMISSING, PA 19610-1254

TO:

Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17120