

LAW OFFICES OF  
**STEPHEN G. WELZ**  
A PROFESSIONAL CORPORATION

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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 Metro Cab, Inc.  
To Application of Dominicana Taxi Express, LLC  
A-2015-2471494

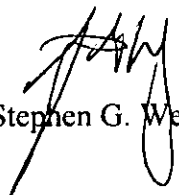
Dear Sir or Madam:

Please accept this letter as my entry of appearance on behalf of Reading Metro Cab, Inc. Enclosed for filing are two copies of the Protest of Reading Metro 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 12:47  
PA P.U.C.  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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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

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PROTEST OF  
READING METRO TAXI CAB, INC.  
A.101102

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

Reading Metro 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";

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

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.

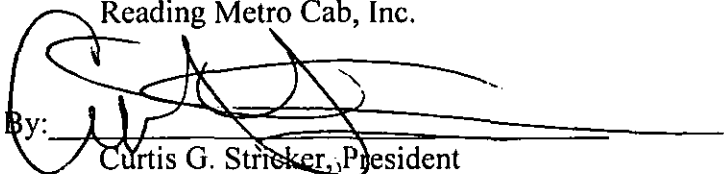
4. Without knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be prepared. In addition, Protestant requires additional information regarding applicant's fitness, financially and otherwise.
5. Protestant holds out to perform and does perform an adequate and 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 Metro Cab, Inc.

By:   
Curtis G. Stricker, President

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2015 APR 21 AM 12:48  
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SECRETARY'S BUREAU

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 :

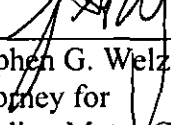
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served a true and correct copy of the foregoing Protest of Reading Metro 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 Metro Cab, Inc.  
Attorney ID 23280

**“Exhibit A”**

COPY

Certificate No. A.101102

Call and Demand PA PUC No. 7

Cancel

Call and Demand PA PUC No. 6

READING METRO TAXI CAB INC.

OPERATING AUTHORITY:

Folder 1

To transport, as a common carrier, by motor vehicle, persons upon call or demand in the City of Reading, Berks County, and within ten (10) miles of the Courthouse in said City;

Folder 2

To transport, as a common carrier, by motor vehicle, persons upon call or demand in the City of Reading, Berks County, and within a radius of ten (10) miles of the corporate limits of the said City, including the boroughs of Birdsboro, Kenhorst, Laureldale, Mohnton, Mt. Penn, Robesonia, Shillington, Sinking Springs, St. Lawrence, Temple, Wernersville, West Lawn, West Leesport, West Reading and Wyomissing, and the townships of Exeter, Spring and Bern, Berks County

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

EXHIBIT A