



Fox Rothschild LLP  
ATTORNEYS AT LAW

2000 Market Street, 20th Floor  
Philadelphia, PA 19103-3222  
Tel 215.299.2000 Fax 215.299.2150  
www.foxrothschild.com

Barnett Satinsky  
Direct Dial: (215) 299-2088  
Internet Address: bsatinsky@foxrothschild.com

May 1, 2015

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

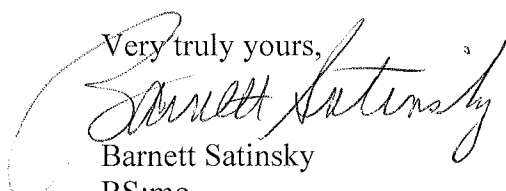
Re: Application of Granny's Helping Hands PA, Inc.  
Docket Number: A-2014-2449185

Dear Secretary Chiavetta:

Enclosed for filing in the above matter is a Restrictive Amendment between Applicant Granny's Helping Hands PA, Inc.; Joint Protestants Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County Transport, Inc.; and Rover Community Transportation, Inc., a copy of which is being served on the Applicant and all parties.

Thank you for your cooperation.

Very truly yours,

  
Barnett Satinsky  
BS:mo  
Enclosure

cc: Darlene D. Heep, Administrative Law Judge (w/encl.) *(via First Class Mail and email)*  
Michael S. Henry, Esquire (w/encl.) *(via e-Service: mshenry@sghlawgroup.com and mshenry@ix.netcom.com)*  
Charles E. Thomas, III, Esquire (w/encl.) *(via e-Service: cet3@tntlawfirm.com)*

A Pennsylvania Limited Liability Partnership

California Colorado Connecticut Delaware District of Columbia  
Florida Nevada New Jersey New York Pennsylvania



Fox Rothschild LLP  
ATTORNEYS AT LAW

Rosemary Chiavetta, Secretary

May 1, 2015

Page 2

cc (cont'd):

Christine Soares, Esquire (w/encl.) *(via email)*

Ms. Patricia Moir (w/encl.) *(via email)*

Mr. Samuel Valenza (w/encl.) *(via email)*

Mr. Mark E. Glatz (w/encl.) *(via email)*

Mr. James Tammaro (w/encl.) *(via email)*

Mr. James Raymond (w/encl.) *(via email)*

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF GRANNY'S HELPING : Docket No. A-2014-2449185  
HANDS PA, INC. :

---

RESTRICTIVE AMENDMENT

---

AND NOW, comes Granny's Helping Hands PA, Inc. (hereinafter "Applicant");  
Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-  
Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a  
Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County  
Transport, Inc. (hereinafter "Joint Protestants"); and Rover Community Transportation, Inc.  
("Rover") and file this restrictive amendment as follows:

1. The above-captioned application is hereby amended to clearly identify and  
specify the territory requested so that the authority sought shall read as follows:

For the right to begin to transport, as a common carrier, by motor  
vehicle, persons, in paratransit service, between points in the  
Counties of Chester, Delaware, Montgomery and Philadelphia;  
provided that service with origination points in the counties of  
Chester and Montgomery shall only be provided on an exclusive  
ride basis as part of companion services offered and provided to  
patients by a direct care worker on behalf of a home care agency  
which is licensed by the Pennsylvania Department of Health.


2. Based upon the Restrictive Amendment set forth in Paragraph 1 above, and  
conditioned upon its acceptance by the Pennsylvania Public Utility Commission (the  
"Commission"), any order issued being consistent therewith, Joint Protestants and Rover agree to  
withdraw their respective protests to the Application as amended. Joint Protestants and Rover

desire to remain parties of record so as to receive copies of any order issued by the Commission in this proceeding.

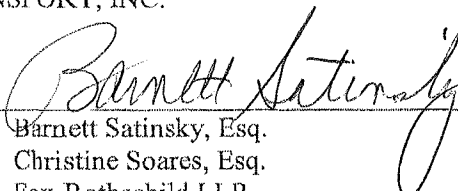
3. If the Restrictive Amendment is not accepted by the Commission, the parties agree that further hearings shall be held to permit Joint Protestants and Rover to present evidence in opposition to approval of the Application.

WHEREFORE, the parties, intending to be legally bound, have hereunto set their hands and seals as of this 30<sup>th</sup> day of April, 2015.


GRANNY'S HELPING HANDS  
PA, INC.

By:   
Michael S. Henry, Esq.  
Salaman, Grayson & Henry, P.C.  
100 S. Broad Street, Suite 650  
Philadelphia, PA 19110  
*Attorney for Granny's Helping  
Hands PA, Inc.*

SUBURBAN TRANSIT NETWORK, INC. t/a  
TRANSNET, WILLOW GROVE YELLOW CAB  
CO., INC. t/d/b/a BUX-MONT YELLOW CAB  
and t/d/b/a BUX-MONT TRANSPORTATION  
SERVICES CO., EASTON COACH COMPANY  
t/a NORRISTOWN TRANSPORTATION  
COMPANY, TRI COUNTY TRANSIT  
SERVICE, INC., and BUCKS COUNTY  
TRANSPORT, INC.

By:   
Barnett Satinsky, Esq.  
Christine Soares, Esq.  
Fox Rothschild LLP  
2000 Market Street, 20<sup>th</sup> Floor  
Philadelphia, PA 19103-3222  
*Attorneys for Joint Protestants Suburban  
Transit Network, Inc. t/a TransNet, Willow  
Grove Yellow Cab Co., Inc. t/d/b/a Bux-  
Mont Yellow Cab and t/d/b/a Bux-Mont  
Transportation Services Co., Easton Coach  
Company t/a Norristown Transportation  
Company, Tri County Transit Service, Inc.,  
and Bucks County Transport, Inc.*

ROVER COMMUNITY  
TRANSPORTATION, INC.

By:   
Charles E. Thomas, III, Esq.  
Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 600  
Harrisburg, PA 17101  
*Attorney for Rover Community  
Transportation, Inc.*

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

GRANNY'S HELPING HANDS PA, INC. : Docket No. A-2014-2449185

**CERTIFICATE OF SERVICE**


I hereby certify that I have on this 1<sup>st</sup> day of May, 2015 served a true copy of the Restrictive Amendment between Applicant Granny's Helping Hands PA, Inc.; Joint Protestants Suburban Network Transit, Inc. t/a TransNet's, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co.'s, Easton Coach Company t/a Norristown Transportation Company's, Tri County Transit Service, Inc.'s, and Bucks County Transport, Inc.; and Rover Community Transportation, Inc. upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54 by the methods set forth below, postage prepaid.

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
*(By eFiling)*

Darlene D. Heep, Administrative Law Judge  
Pennsylvania Public Utility Commission  
Suite 4063  
801 Market Street  
Philadelphia, PA 19107  
*(By First Class Mail, Postage Prepaid and email)*

Michael S. Henry, Esq.  
Salaman, Grayson & Henry, P.C.  
100 S. Broad Street, Suite 650  
Philadelphia, PA 19110  
*(Counsel for Applicant)*  
*(By e-Service: mshenry@sghlawgroup.com and mshenry@ix.netcom.com)*

Charles E. Thomas, III, Esquire  
Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 600  
P.O. Box 9500  
Harrisburg, PA 17108-9500  
(Counsel for Rover Community Transportation, Inc.)  
(By e-Service: [cet3@tnlawfirm.com](mailto:cet3@tnlawfirm.com))

  
BARNETT SATINSKY, ESQUIRE