

# PAGE, WOLFBERG & WIRTH LLC

ATTORNEYS & CONSULTANTS

## PARTNERS

JAMES O. PAGE (1936-2004)  
DOUGLAS M. WOLFBERG ○ Δ  
STEPHEN R. WIRTH ○

5010 EAST TRINDLE ROAD, SUITE 202  
MECHANICSBURG, PA 17050

## ASSOCIATES

CHRISTINA M. MELLOTT ○  
DANIEL J. PEDERSEN ○  
RYAN S. STARK ○  
AMANDA WARD □

## OF COUNSEL

KENNETH E. BRODY ○

TELEPHONE (717) 691-0100  
FACSIMILE (717) 691-1226  
WWW.PWWEMSLAW.COM

## CONSULTANTS

STEVEN M. JOHNSON  
CHRISTINE M. MILLER  
LISA W. BERNHARD, CPA

○ MEMBERS, PENNSYLVANIA BAR  
Δ MEMBER, NEW YORK BAR  
□ MEMBER, CALIFORNIA BAR

CHRISTINA M. MELLOTT  
cmellott@pwwemslaw.com

May 18, 2015

VIA ELECTRONIC FILING

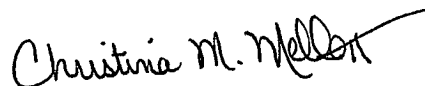
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: Application of Leon Earle Saucier;  
PUC Docket No. A-2015-2475065

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Protest and Request for Oral Hearing of the Protestants: (1) *Ephrata Community Ambulance Association, Inc.*; and (2) *Manheim Township Ambulance Association t/a Central Lancaster Medical Transport Service* regarding the above-referenced Application. As evidenced by the attached Certificate of Service, this filing has been served on the Applicant pursuant to the Commission's rules and within the required time frame. Please let us know if you have any questions regarding this matter.

Very truly yours,



Christina M. Mellott  
for PAGE, WOLFBERG & WIRTH, LLC

CMM:ms  
Enclosures

cc: Leon Earle Saucier

May 18, 2015  
Page 2

Ephrata Community Ambulance Association, Inc.  
Manheim Township Ambulance Association t/a Center Lancaster Medical  
Transport Service



4. Protestant, Ephrata Community Ambulance Association, Inc., holds authority from the Commission at Docket Number A-00113749, as follows:

To transport, as a common carrier, persons in paratransit service, between points in the borough of Ephrata, Lancaster County, and within an airline radius of 40 statute miles of the limits of said borough, and from points in said territory to points in Pennsylvania and return.

A true and correct copy of the Certificate of Public Convenience, evidencing this authority held by Protestant, Ephrata Community Ambulance Association, Inc., is attached hereto as Appendix B.

5. The name, address and telephone number of the second of the two Protestants set forth herein is:

MANHEIM TOWNSHIP AMBULANCE ASSOCIATION  
t/a CENTRAL LANCASTER MEDICAL TRANSPORT SERVICE  
1820 Municipal Drive  
Lancaster, PA 17601  
(717) 569-6622

6. Protestant, Manheim Township Ambulance Association t/a Central Lancaster Medical Transport Service holds authority from the Commission at Docket Number A-00114666, as follows:

To transport, as a common carrier, non-ambulatory persons in paratransit service, using van-type vehicles with wheelchair lifts and or stretcher mounted equipment between points in the counties of Adams, Berks, Bucks, Chester, Cumberland, Dauphin, Lancaster, Lebanon, Lehigh, Montgomery, Schuylkill and York, and from points in said counties, to other points in Pennsylvania, and vice versa.

A true and correct copy of the Certificate of Public Convenience, evidencing this authority held by Protestant, Manheim Township Ambulance Association t/a Central Lancaster Medical Transport Service is attached hereto as Appendix C.

7. Approval of this Application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since: (a) the Protestants presently hold authority to provide service in the area affected by the Application prior to any resolution of the Application; (b) the Protestants and other existing carriers are providing adequate service to the public in the area involved in the Application; (c) there is no need for the service proposed by the Applicant and approval of the Application will result in the diversion from existing carriers of revenue necessary to sustain their existing operations; and (d) approval of the Application will adversely affect the Protestants and other existing carriers which have a substantial investment in facilities and equipment and are willing and able to provide service in the Application area.

8. Protestants request that the Application be set for oral hearing and that the Applicant be required to prove by competent evidence the elements of proof required by statute and regulation. If an oral hearing is held, each of the Protestants will appear and present evidence of each Protestant's own operations and particular interests, unless this Application is amended so as to eliminate those interests as set forth in this Protest.

9. Pursuant to Section 333(c) of the Public Utility Code (66 Pa. C.S.A. § 333(c)), Protestants hereby request a list of witnesses expected to testify in the above-titled proceeding, together with the subject matter of their anticipated testimony, and, in particular, any complaints or any evidence pertaining to the service of any or all of the Protestants.

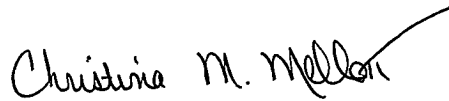
10. The Protestants know of no amendments that would satisfy their interests in this proceeding short of eliminating each of the Protestant's particular interests.

WHEREFORE, Protestants, (1) Ephrata Community Ambulance Association, Inc.; and (2) Manheim Township Ambulance Association t/a Central Lancaster Medical

Transport Service, request that the granting of the Application be withheld; the proceeding be assigned for oral hearing with leave to the Protestants to participate fully therein; and that the Applicant be required to make available at the hearing competent witnesses for examination on all material and relevant facts bearing on the Application.

Respectfully submitted,

Dated: May 18, 2015



---

Christina M. Mellott, Esquire  
Attorney I.D. No. 81369

PAGE, WOLFBERG & WIRTH, LLC  
5010 East Trindle Road, Suite 202  
Mechanicsburg, PA 17050  
(717) 691-0100; (717) 691-1226 (fax)

Counsel for Protestants: (1) Ephrata Community  
Ambulance Association, Inc.; and (2) Manheim  
Township Ambulance Association t/a Central  
Lancaster Medical Transport Service

**A-2015-2475065. Leon Earle Saucier** (237 Lamparter Road, Quarryville, Lancaster County, Pennsylvania 17566) persons in paratransit service, from points in Lancaster County, to points in Pennsylvania and return.

**PENNSYLVANIA BULLETIN  
VOLUME 45, NUMBER 18  
MAY 2, 2015**

**APPENDIX A**

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION

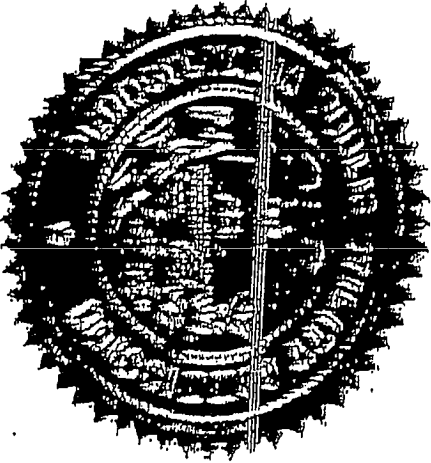
IN THE MATTER OF THE APPLICATION OF: A-0013749

EPHRATA COMMUNITY AMBULANCE ASSOCIATION, INC.,  
a corporation of the Commonwealth of PA

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 24th day of July, 1997.

*Francis A. McNeill*  
Acting Secretary





**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

IN THE MATTER OF THE APPLICATION OF: A-00114666

Manheim Township Ambulance Association  
t/d/b/a Central Lancaster Medical Transport Service,  
a corporation of the Commonwealth of Pennsylvania

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 18th day of September, 1998.

*Thomas G. McManis*  
Secretary



Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

---

In re:           APPLICATION OF                                 :  
                  LEON EARLE SAUCIER                         :         Docket No. A-2015-2475065

---

**CERTIFICATE OF SERVICE**

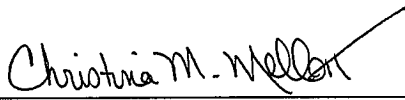
I hereby certify that I have this day served a true copy of the foregoing Protest and Request for Oral Hearing upon the Applicant listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant). This Protest and Request for Oral Hearing was electronically filed with the Commission on this day.

**VIA FIRST CLASS MAIL**

Leon Earle Saucier  
237 Lamparter Road  
Quarryville, PA 17566

*Applicant, Leon Earle Saucier*

Dated this 18<sup>th</sup> day of May, 2015.

  
Christina M. Mellott  
Attorney I.D. No. 81369  
PAGE, WOLFBERG & WIRTH, LLC  
5010 East Trindle Road, Suite 202  
Mechanicsburg, PA 17050  
(717) 691-0100  
(717) 691-1226 (fax)

Counsel for Protestants: (1) Ephrata Community Ambulance Association, Inc.; and (2) Manheim Township Ambulance Association t/a Central Lancaster Medical Transport Service