



THOMAS, NIESEN & THOMAS, LLC

*Attorneys and Counsellors at Law*

THOMAS T. NIESEN  
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June 3, 2015

**Via Electronic Filing**

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

In re: Docket No. A-2015-2475776  
Application of Amigo Cab, LLC

Dear Secretary Chiavetta:

We are counsel to Autocab, Inc. and are submitted via electronic filing its Protest to the above-referenced Application of Amigo Cab, LLC. A copy of the Protest is being served upon the Applicant as set forth on the certificate of service attached to it.

Please enter my appearance on behalf of Autocab, Inc. and contact me if you have any questions or need any further information in regard to this matter.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Thomas T. Niesen

Enclosure

cc: Certificate of Service (w/encl.)  
Greg Vannucci (via email, w/encl.)

150603-Chiavetta (Protest).wpd

**Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**Application of Amigo Cab, LLC                   :   Docket No. A-2015-2475776**

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**PROTEST OF AUTOCAB, INC.**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

AND NOW, comes Autocab, Inc. (“Protestant”), by its attorneys, and, pursuant to 52 Pa. Code §3.381, files this Protest to the Application of Amigo Cab, LLC (“Applicant”). In support thereof, Protestant submits as follows:

1.     The name and address of Protestant are:

Autocab, Inc.  
625 East Orange Street  
Lancaster, PA 17602  
(717) 290-8783

2.     The name and address of Protestant's attorneys are:

Thomas T. Niesen, Esquire  
THOMAS, NIESEN & THOMAS, LLC  
212 Locust Street, Suite 600  
Harrisburg, PA 17101  
(717) 255-7641  
[tniesen@tntlawfirm.com](mailto:tniesen@tntlawfirm.com)

3.     Applicant has filed an Application with the Public Utility Commission (“Commission”) seeking authority to provide call or demand service from points in the Counties of Berks and Lancaster to points in Pennsylvania, and return.

4.     Protestant holds authority of the Commission in conflict with the authority sought by Applicant. The call or demand portion of Protestant's authority at Docket No. A-

00119919, Folder 2, upon which its protest is predicated is attached hereto and made a part hereof.

5. Protestant operates motor carrier equipment suitable for the transportation involved and is fit and able to provide the service in its authorized area. Absent on the record presentations, Protestant does not believe there is a need for the proposed service as described in the application. In addition, there is no evidence that Applicant can meet the criteria in 52 Pa. Code §41.14, and, thus, approval of the Application is not necessary or proper for the service, accommodation, convenience or safety of the public and would be contrary to the public interest.

6. Protestant submits further that the entry of a new carrier would endanger or impair the operations of existing carriers to an extent that, on balance, the granting of authority would be contrary to the public interest.

7. A restrictive amendment removing Protestant's authorized Lancaster County service area, in its entirety, from Applicant's proposed service area would protect Protestant's interest and result in a withdrawal of the protest.

8. Pursuant to Section 333(c) of the Public Utility Code, 66 Pa. C.S. §333(c), demand is made upon Applicant to furnish to Protestant's counsel a list of the names and addresses of the witnesses, names and addresses of the entity that they represent, if any, and the subject matter of their expected testimony. This is a continuing request and is applicable to all witnesses to be called.

**WHEREFORE**, Autocab, Inc. requests that the Pennsylvania Public Utility Commission deny and dismiss the Application of Amigo Cab, LLC at Docket No. A-2015-2475776.

Respectfully submitted,

By  \_\_\_\_\_

Thomas T. Niesen, Esquire  
PA Attorney ID No. 31379  
THOMAS, NIESEN & THOMAS, LLC  
212 Locust Street, Suite 600  
P.O. Box 9500  
Harrisburg, PA 17108-9500

*Attorney for Autocab, Inc.*

DATE: June 3, 2015

Protest - Autocab.wpd

PENNSYLVANIA INTRASTATE AUTHORITY OF  
AUTOCAB, INC.

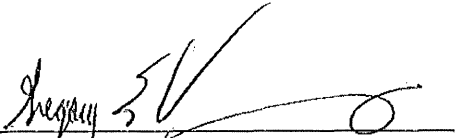
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A. 00119919, Folder 2

Persons upon call or demand in the County of Lancaster.

**VERIFICATION**

I, Greg Vannucci, CFO of Autocab, Inc., hereby state that the facts set forth in the foregoing Protest are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. §4904 (relating to unsworn falsification to authorities).

  
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Greg Vannucci

Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Application of Amigo Cab, LLC : Docket No. A-2015-2475776

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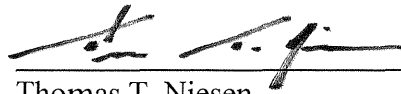
CERTIFICATE OF SERVICE

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I hereby certify that I have this 3<sup>rd</sup> day of June 2015 served a true and correct copy of the foregoing Protest, upon the persons and in the manner set forth below:

**FIRST CLASS MAIL, POSTAGE PREPAID**

Justine L. Pate, Esquire  
620 South 13<sup>th</sup> Street  
Harrisburg, PA 17104  
*Counsel for Amigo Cab, LLC*



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Thomas T. Niesen