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June 29, 2015

VIA ELECTRONIC FILING

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

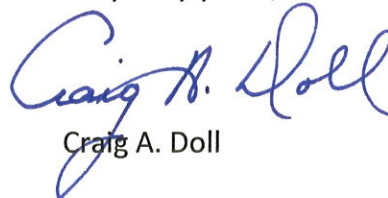
Re: Wayne Storage Company
Petition for Reinstatement
Commission Docket No. A-00108351

Dear Secretary Chiavetta:

Enclosed for filing is a Petition for Reinstatement, which was eFiled this date. A copy of this Motion has been served via email and first class mail upon the Bureau of Technical Utility Services.

If you have any questions, please feel free to contact me.

Very truly yours,



Craig A. Doll

cc: TUS
Wayne Storage Co.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Wayne Storage Company : A-00108351

PETITION FOR REINSTATEMENT

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Now comes, Wayne Storage Company (“Wayne Storage” or “Petitioner”), by and through its undersigned counsel, and pursuant to the provisions of 52 Pa. Code §5.21, files this Petition for Reinstatement (“Petition”), requesting that this Commission reinstate its Certificate of Public Convenience at A-00108351. Additionally, Petitioner requests expedited treatment of this Petition. In support of this request, Petitioner states as follows:

1. Petitioner is a certificated provider of transportation services, holding a Certificate of Public Convenience to provide services as a carrier of household goods in use. *Application of Wayne Storage Company*, A-0010851 (February 15, 1989).
2. Petitioner’s mailing address is 100 Lawrence Drive, West Chester, PA 19380.
3. On or about June 5, 2015, on another matter, the Commission forwarded a letter to Wayne Storage at the above address.
4. A search of its incoming mail logs reveals that this letter was not received by Wayne Storage. The existence of the letter was only discovered by counsel when a search was made of the Commission’s database on June 24, 2015.
5. By order entered July 14, 2011, Petitioner’s Certificate was cancelled for failure to pay an assessment of \$786.00.

6. Pursuant to that Order, Petitioner was to pay a civil penalty of \$100.00 and PennDOT was requested not to renew any of its vehicle registrations.

7. Petitioner has, since the issuance of that order, had all of its vehicle registrations renewed by PennDOT.

8. Petitioner learned of the cancellation of its Certificate when it attempted to transfer the title of certain vehicles with PennDOT in February – March, 2015.

9. Upon learning of the cancellation of its certificate and the imposition of a civil penalty, Petitioner paid the civil penalty on May 30, 2015.

10. Petitioner timely filed its 2010 Annual Assessment Report which report served as the basis of the Commission's FY 2011-2012 assessment.

11. A search of Petitioner's records does not indicate that it received the Commission's invoice for the FY 2011- 2012 assessment.

12. Petitioner simultaneously filed annual Assessment Reports of its sister company, Wayne Moving & Storage of New Jersey at the same time as its own. A review of the Commission's records indicated that Wayne Moving & Storage of New Jersey has no outstanding assessment amount or civil penalties due.

13. Petitioner believes and therefore avers that its 2011 Annual report was filed simultaneously with that of its sister company. This annual report would have served as the basis of its Fiscal Year 2012-2013 Assessment.

14. To the best of Petitioner's knowledge and belief, it did not receive an invoice for Fiscal Year 2012-2013.

15. To the best of Petitioner's knowledge, and after a diligent search of its records, it did not receive a copy of the Commission's Order cancelling its certificate for failure to pay its 2011-2012 assessment.

16. The criteria for the granting of a Petition for Reinstatement is set forth in the Commission proceeding of *Pennsylvania Public Utility Commission, Bureau of Transportation & Safety v. Reach for the Stars Limousine, Inc.*, C-2011-2245156 (May 10, 2012).

17. The Commission, in exercising its discretion to grant or deny reinstatement, has identified five factors relevant to its decision: (1) the amount of time which has elapsed between the cancellation of the certificate of public convenience and the filing of the petition to reinstate; (2) whether the petitioner has a record of habitually violating the Public Utility Code; (3) the reasonableness of the excuse given for the violation that caused the certificate to be cancelled; (4) whether petitioner has implemented procedures to prevent a recurrence of the circumstances giving rise to the subject complaint; and (5) whether the petitioner is in compliance with the requirement that all outstanding civil penalties and/or assessments must be current prior to reinstatement.

18. Under the circumstances, the time elapsed between Petitioner becoming aware of the cancellation of his certificate and the filing of this Petition is reasonable. While the Order cancelling Petitioner's certificate was issued July 14, 2011, Petitioner was not aware of the cancellation until it attempted to transfer the title to new vehicles purchased for its operations.

19. Petitioner believes that the time between the date of the cancellation and the filing of this Petition for Reinstatement is reasonable.

20. Commission records do not indicate that Petitioner is a habitual violator of the Public Utility Code. Upon learning of the cancellation of its certificate, Petitioner ceased operations and has contacted the Commission's Assessment Office to determine what reports have to be furnished and the amount of unissued assessment invoices.

21. The filing of annual Assessment Reports and the payment of Assessment Invoices by its sister corporation with the Commission is indicative of both companies complying with the rules and regulations of this Commission.

22. Petitioner has paid the \$100.00 civil penalty and, according to Commission records, has an approximate \$14.00 credit on its account.

23. Since the discovery of the cancellation of its certificate, Petitioner has designated one individual to track any communications from the Commission to avoid failing to act upon any such communication in a timely manner.

24. Petitioner has informed its personnel to immediately forward and communication from the Commission to that individual.

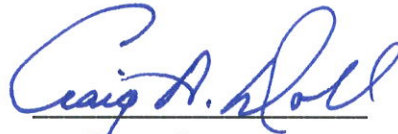
25. Petitioner has instructed its fiscal office to establish a system to track the due dates of the various Pennsylvania and Federal reports that it is required to file.

26. Petitioner will mark any assessment invoices for priority payment in its accounting system.

27. Petitioner stands willing and able to furnish all reports and pay any Assessment invoices forwarded to it by the Commission. To this end, Petitioner has completed annual Assessment Reports for 2011, 2012, 2013, and 2014 and is forwarding them to the Commission.

WHEREFORE, Petitioner respectfully requests that the Commission grant this Petition and reinstate its certificate.

Respectfully submitted,



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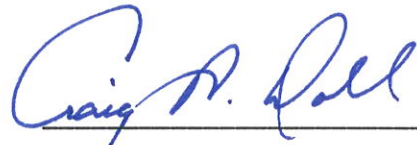
Attorney I.D. # 22814

Attorney for Petitioner

Dated: June 29, 2015

ATTORNEY'S VERIFICATION

I, Craig A. Doll, Esquire, attorney for Wayne Storage Company hereby verify that I have become acquainted with the facts and information set forth in the foregoing document which have been relayed to me by representatives of Wayne Storage Company; that the same are true to the best of my knowledge information and belief; and that the foregoing verification is made subject to the penalties of 18 Pa. C.S. § 4904.



Craig A. Doll, Esquire

DATED: June 29, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Wayne Storage Company : A-00108351

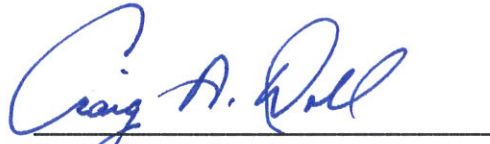
CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing Petition for Reinstatement upon the persons listed below in the manner set forth in accordance with the provisions of 52 Pa. Code §1.54.

E-filing

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

Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
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Attorney for GEM Ambulance LLC

DATED: June 29, 2015