

July 20, 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-2015-2472506
Application of Andrews Transportation, LLC

Dear Secretary Chiavetta:

We are counsel to Homestead Taxi, LLC and Homestead Transportation, LLC and are submitting via electronic filing their Joint Protest to the above-referenced Application of Andrews Transportation, LLC. A copy of the Joint Protest is being served upon the persons and in the manner set forth on the certificate of service attached to it.

Please enter my appearance on behalf of Homestead Taxi, LLC and Homestead Transportation, LLC and contact me if you have any questions or need any additional information.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By



Thomas T. Niesen

Enclosure

cc: Certificate of Service (w/encl.)
Nicholas Chermela (w/encl.)

150716-Chiavetta (Protest).wpd

**Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In re: Application of Andrews : Docket No. A-2015-2472506
Transportation, LLC :**

**JOINT PROTEST OF HOMESTEAD TAXI, LLC AND
HOMESTEAD TRANSPORTATION, LLC**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Homestead Taxi, LLC and Homestead Transportation, LLC (hereinafter, collectively, "Protestants"), by their attorney, and, in protest to the Application of Andrews Transportation, LLC ("Applicant") for authority to transport persons in airport transfer service, as forth therein, respectfully represent the following:

1. Applicant's name and the docket number of its Application are:

Andrews Transportation, LLC
Docket No. A-2015-2472506

2. The name and address of Protestants are:

Homestead Taxi, LLC
150 South Broad Street
Lansdale, Pa. 19446
(215) 855-9006

Homestead Transportation, LLC
150 South Broad Street
Lansdale, Pa. 19446
(215) 345-0100

3. The name and address of Protestants' attorney are:

Thomas T. Niesen, Esquire
PA Attorney ID No. 31379
Thomas, Niesen & Thomas, LLC
212 Locust Street
Suite 600
Harrisburg, PA 17101
(717) 255-7641

4. Applicant has applied for authority to provide airport transfer service from points in the Counties of Bucks, Delaware and Montgomery to the Philadelphia

International Airport, excluding service that is under the jurisdiction of the Philadelphia Parking Authority. Protestants hold call or demand authority, including call or demand authority in Bucks and Montgomery Counties, that enables them to provide transportation service to the Philadelphia International Airport and, thus, conflicts with what the Applicant seeks through its application. The call or demand authority of Protestant Homestead Taxi, LLC at A-00117413, Folder 1, and Folder 1, Am-A, upon which its protest is predicated is attached hereto as Attachment A and made a part hereof. The call or demand authority of Protestant Homestead Transportation, LLC at A-00123118 and A-2010-2165832, upon which its protest is predicated is attached hereto as Attachment B and made a part hereof.

5. Absent on the record presentations, Protestants do 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 would be contrary to the public interest. It is Joint Protestants' understanding, moreover, that Applicant has been cited by the Public Utility Commission for providing unauthorized service. Unauthorized service is a basis for denying Applicant's application pursuant to 52 Pa. Code § 41.14(b).

6. Protestants submit 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. In sum, approval of this Application, as currently constituted, is not necessary or proper for the service, accommodation, convenience or safety of the public.

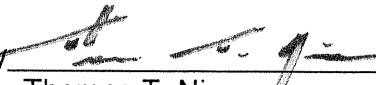
8. Protestants' interests would be protected if Applicant would completely remove Protestants' authorized service territory from Applicant's proposed service territory.

9. Pursuant to Section 333(c) of the Public Utility Code, demand is made upon Applicant to furnish to Protestants' 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 Homestead Taxi, LLC and Homestead Transportation, LLC request that the Pennsylvania Public Utility Commission deny and dismiss the Application of Andrews Transportation, LLC at Docket No. A-2015-2472506.

Respectfully submitted,

HOMESTEAD TAXI, LLC
HOMESTEAD TRANSPORTATION, LLC

By 
Thomas T. Niesen
PA Attorney ID No. 31379

Attorney for Homestead Taxi, LLC and
Homestead Transportation, LLC

THOMAS, NIESEN & THOMAS, LLC
212 Locust Street
Suite 600
Harrisburg, PA 17101
(717) 255-7641

Dated: July 20, 2015

Attachment A

HOMESTEAD TAXI LLC

OPERATING AUTHORITY

Folder 1

To transport, as a common carrier:

- (1) persons upon call or demand in the borough of Sellersville, Bucks County
- (2) persons upon call or demand in the borough of Perkasio, Bucks County
- (3) persons upon call or demand within the portion of West Rockhill Township beginning at a point at the intersection of Lawn Avenue and Highway Route 563 (Ridge Road), thence west along Highway Route 563 to the intersection of Highway Route 563 and L.R. 09106 (Ridge Valley Road), thence northwest along L.R. 09106 (Ridge Valley Road) to the Milford Township Line, thence west along Milford Township line to the boundary line between Montgomery County and Bucks County, thence south along said boundary between Montgomery County and Bucks County, to the boundary of the borough of Telford, thence east and south along the boundary lines of the borough of Telford to the intersection of said boundary line and T 429 (Township Line Road), excluding all points within the borough of Telford, thence east along T 429 to the Sellersville borough line thence north and east along the Sellersville borough line to Old Bethlehem Pike, thence north along Old Bethlehem Pike to Highway Route 563 (Ridge Road), thence west along Highway Route 563 to the point of beginning;
- (4) persons upon call or demand in that portion of East Rockhill Township beginning at the northern boundary of Perkasio borough and East Rockhill Township at Ridge Road east of the intersection of Blooming Glen Road, thence east along Ridge Road to the eastern boundary of East Rockhill Township, thence south along said boundary to a point at the intersection of said boundary and Highway Route 313, thence west along the southern boundary of East Rockhill Township to the eastern boundary of Perkasio borough (at Callowhill Road), thence north along the eastern boundary of Perkasio borough to the point of beginning;
- (5) persons upon call or demand in the borough of Quakertown, Bucks County
- (6) persons upon call or demand in that portion of the county of Bucks bounded as follows: beginning at the intersection of traffic route 563 (TR 563), and Legislative Route 09106 (L.R. 09106) in the township of West Rockhill thence in a westerly direction along L.R. 09106 to its intersection with L.R. 09111, thence along L.R. 09111, in a northerly direction and thence in an easterly direction to the northeast extension of the Pennsylvania Turnpike, thence along said Turnpike in a northerly direction to L.R. 09109, thence in a westerly direction along L.R. 09109 to its intersection with TR 663, thence along TR 663, and an unnamed

HOMESTEAD TAXI LLC

road in a northeasterly direction to the point of meeting of the said northeastern extension of the Pennsylvania Turnpike and L.R. 09097, thence along L.R. 09097 in a northeasterly direction and an easterly direction to its intersection with the Old Bethlehem Pike (Route 153 Spur), thence along said Old Bethlehem Pike to L.R. 09094, thence along L.R. 09094 in an easterly direction to U.S. Route 309, thence in a northerly direction along U.S. Route 309 to L.R. 09089, thence along L.R. 09089 in an easterly direction to Richlandtown borough, thence in a northerly direction around the western boundary of Richlandtown borough to L.R. 09080, thence in a northerly direction along L.R. 09080 to L.R. 09145, thence in an easterly direction along L.R. 09145 to its intersection with Pennsylvania State Route 212, thence east on Pennsylvania State Route 212 to its intersection with L.R. 09127, thence in an easterly direction along L.R. 09127 to L.R. 09068, thence in a southerly direction along L.R. 09068 to L.R. 09019, thence along L.R. 09019 in an easterly direction to L.R. 09130 and in a southerly direction along L.R. 09130 to Nockamixon State Park, thence via an imaginary line through Nockamixon State Park to the intersection of Ridge Road and L.R. 09093, thence westerly on Ridge Road to its intersection to L.R. 09090, thence north via L.R. 09090 to its intersection with L.R. 09102 thence via L.R. 09102, to its intersection with Park Avenue, thence via Park Avenue to its intersection with Pennsylvania Traffic Route 563, thence south via Pennsylvania Traffic Route 563 to the point of beginning; and

- (7) property, excluding household goods in use between points in Pennsylvania

Folder 1, Am-A

To transport, as a common carrier, persons, upon call or demand, in the boroughs of Hatfield, Lansdale, Souderton, Telford, and North Wales, and the townships of Montgomery, Hatfield, Upper Gwynedd, Lower Gwynedd, Towamencin, Whitpain, Worcester, Lower Salford, and Franconia, all in Montgomery County.

Attachment B

HOMESTEAD TRANSPORTATION LLC

LIST OF CHANGES MADE BY THIS TARIFF

1. Operating authority is amended in accordance with the Commission's order under Certificate No. A-00123118. Public meeting held July 15, 2010.
2. Hours of Operation.

OPERATING AUTHORITY

A-00123118

To transport, as a common carrier by motor vehicle, persons upon call or demand in the borough of Doylestown, Bucks County, and within an airline distance of five (5) statute miles of the limits of said borough;

subject to the following condition:

~~That no right, power or privilege is granted to render service in the borough of Ivyland and the townships of Warminster, Warrington, and Warwick, all in the county of Bucks.~~

A-00123118, A-2010-2165832

To transport, as a common carrier, persons in call or demand service, from points in the borough of Silverdale, Bucks County, and within an airline distance of 12 statute miles of the limits of said borough; excluding any right, power, or privilege, to render service in the borough of Ivyland and the townships of Warminster, Warrington, and Warwick, all within Bucks County.

VERIFICATION

I, Nick Chermela, President of Homestead Taxi, LLC and Homestead Transportation, LLC, hereby state that the facts set forth in the foregoing Joint 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).

A handwritten signature in black ink, appearing to read "Nick Chermela", written over a horizontal line.

Nick Chermela


**Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: **Application of Andrews : Docket No. A-2015-2472506**
Transportation, LLC :
:

CERTIFICATE OF SERVICE

I hereby certify that I have this 20th day of July 2015 served a true and correct copy of the foregoing Joint Protest of Homestead Taxi, LLC and Homestead Transportation, LLC upon the persons listed below by first class mail, postage prepaid:

Dwayne Andrews
Andrews Transportation, LLC
151 East Main Street
Lansdale, PA 19446



Thomas T. Niesen
PA Attorney ID No. 31379