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HENRY M. WICK, JR.
(1921 - 2007)
CARL F. MEYER
(1929 - 2009)

August 14, 2015

Re: Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement v.
Ward Logistics, LLC
Docket No. C-2015-2494472
Our File 6634.006

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

Filed Electronically

Dear Secretary Chiavetta:

We are electronically filing with the Commission this date the attached Respondent's Answer to Complaint ("Answer") on behalf of our client, Respondent Ward Logistics, LLC, in connection with the above captioned case. As set forth in the Answer, Respondent is not objecting to the Commission issuing an Order to revoke Respondent's Certificate of Public Convenience at Docket No. C-2015-2494472.

As indicated in the Certificate of Service, a copy of the enclosed Answer is being served upon Michael L. Swindler, Prosecutor.

Very truly yours,

WICK, STREIFF, MEYER,
O'BOYLE & SZELIGO, P.C.


David M. O'Boyle

DOB/rms
Enclosures

cc: Michael L. Swindler, Prosecutor (w/encl.)
Ward Logistics, LLC (w/encl.)

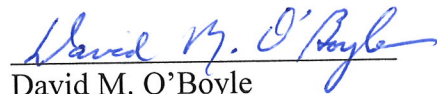
due to a corporate restructuring of its operations with other affiliated companies, Respondent ceased its certificated motor carrier operations on or about October 10, 2013, which was long before Respondent's evidence of public liability and damage insurance and evidence of cargo insurance on file with the Commission were cancelled effective July 13, 2015. Furthermore, Respondent was not aware of the Commission's regulations requiring that a certificated carrier file an Application for Approval of Abandonment to discontinue service. Respondent has no objection to the Commission revoking the Certificate of Public Convenience that was issued to Respondent at Docket No. A-00119480. However, Respondent objects to the proposed penalty of \$500.00 and submits that the circumstances involved in this matter do not warrant any fine being imposed upon Respondent since there has not been any risk of harm or danger to the public due to Respondent's oversight in not notifying the Commission that it planned to cease providing certificated motor carrier service to the public, and since Respondent did not intentionally violate the Commission's regulations in not filing the Application for Approval of Abandonment.

5. The allegations in Paragraph 5 of the Complaint constitute conclusions of law, and Respondent is not contesting those allegations. In further response, Respondent again states that Respondent does not have any objection to the Commission revoking the Certificate of Public Convenience that was issued to Respondent at Docket No. A-00119480, and thereby cancelling all of the operating authority issued to Respondent because Respondent has not conducted any motor carrier service pursuant to its Certificate for a period of over 21 months. Attached hereto as Exhibit "A" is a copy of Respondent's 2014 Assessment Report - Motor Carriers, which confirms that Respondent had no revenue from either interstate or intrastate operations from January 1, 2014 through December 31, 2014.

WHEREFORE, Respondent respectfully submits that any violations of the Commission's regulations were not intentional and, since Respondent has ceased operating pursuant to its Certificate, Respondent submits that it has no objection to the Commission entering an order revoking the Certificate of Public Convenience issued to Respondent without imposing any fine upon Respondent.

Respectfully submitted,

WICK, STREIFF, MEYER,
O'BOYLE & SZELIGO, P.C.



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Ward Logistics, LLC



COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION
PO BOX 3265
HARRISBURG, PA 17105-3265

2014 ASSESSMENT REPORT-MOTOR CARRIERS

This Report **MUST BE FILED** not later than **MARCH 31, 2015**. Failure to file may result in fines up to \$1,000 for each day a violation continues (66 Pa. C.S. § 3301).

TRADE OR CORPORATE NAME OF UTILITY: WARD LOGISTICS, LLC		UTILITY CODE 706038	APPLICATION # A-00119480
CONTACT NAME: TOBIAS E. MERCER			
ADDRESS 1: PO BOX 310		ADDRESS 2 (Floor, Suite, etc.):	
CITY, STATE, ZIP: ALTOONA, PA 16603			

OPERATING REVENUE FOR CALENDAR YEAR 2014 (January 1, 2014-December 31, 2014)
(All amounts shall be rounded to the nearest dollar.)

	PROPERTY	HOUSEHOLD GOODS	PASSENGER	
			Group and Party 16 or more	Passenger 15 and Under
1. PA INTRASTATE OPERATING REVENUE	\$ 0	\$ 0	\$ 0	\$ 0
2. PA EXEMPT INTRASTATE REVENUE	\$ 0	\$ 0	\$ 0	\$ 0
3. PA NET INTRASTATE OPERATING REVENUE (Subtract Line 2 from Line 1)	\$ 0	\$ 0	\$ 0	\$ 0

(All amounts shall be rounded to the nearest dollar.)

PA EXEMPT INTRASTATE REVENUE Enter a number from enclosed Exempt Revenue list as applicable. (Attach additional sheets as needed)	PROPERTY	HOUSEHOLD GOODS	PASSENGER	
			Group and Party 16 or more	Other
	\$	\$	\$	\$
TOTAL (Enter on Line 2 above)	\$ 0	\$ 0	\$ 0	\$ 0

UCR REGISTRATION INFORMATION

2014 UCR Registered: YES NO

IF YES:

US DOT #: 1159262 INTERSTATE OPERATING REVENUE: \$ 0

MC Number: 748582

AUTHORIZATION FOR RELEASE OF STATE TAX RECORDS

In accordance with Sections 505 and 506 of the Public Utility Code, as a means to verify the accuracy of financial information supplied to the Public Utility Commission, I hereby authorize the Pennsylvania Department of Revenue to release to the Public Utility Commission, any tax records filed or compiled with regard to the below-listed utility and/or individual.

WARD LOGISTICS, LLC
Utility Name

X [Signature]
Signature

Date: 03/30/2015

TOBIAS E. MERCER CONTROLLER
Name (Printed) Title

AFFIDAVIT

I affirm that the information reported herein is complete, true and correct.

[Signature] 03/30/2015
(Signature of Individual or Officer) (Date)

READABLE (PRINT OR TYPE) NAME OF INDIVIDUAL or OFFICER ABOVE:

TOBIAS E. MERCER

NOTARIZATION (Required)

Subscribed and sworn to before me

this 30 day of March 2015

TRADE NAME OR CORPORATE NAME OF UTILITY:

WARD LOGISTICS, LLC

NOTARY SIGNATURE

OFFICIAL SEAL

[Signature]
(Official Title)

FEDERAL ID:

32-0046537

TELEPHONE NO.:

Office (814) 947-1322 Ext.
Cell ()

February 5, 2016

Name of person to be contacted for additional information:

Name: TOBIAS E. MERCER
(printed)

Telephone: 814-947-1322 Ext.

(Date My Commission Expires)

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Alicia M. Snare, Notary Public

Logan Twp., Blair County

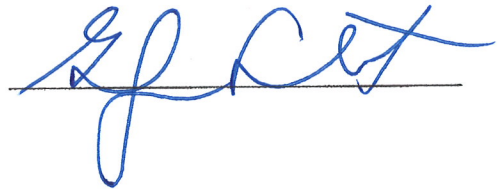
My Commission Expires Feb. 5, 2016

MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

VERIFICATION

I, Glynn Stewart, hereby verify and affirm that I hold the office of CFO with Ward Logistics, LLC ("Respondent"), that I am authorized to submit this Verification on behalf of Respondent, that I have read the foregoing Respondent's Answer to Complaint ("Answer"), and that the facts set in the Answer are true and correct to the best of my knowledge, information and belief. I understand that any false statements herein are made subject to the penalties of 18 Pa.C.S.A. Section 4904 relating to unsworn falsifications to authorities.

Dated: 8/12/2015

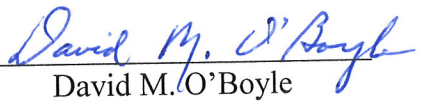
A handwritten signature in blue ink, appearing to read 'Glynn Stewart', is written over a horizontal line.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Respondent's Answer to Complaint was served this date by first class, U. S. Mail, postage prepaid, upon the following:

Michael L. Swindler, Prosecutor
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Date: 8-14-2015


David M. O'Boyle