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August 20, 2015

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Shane Transport, Inc.  
Docket No. C-2015-2494474  
Our File 6909.003

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

Filed Electronically

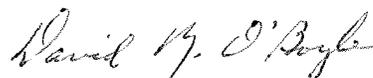
Dear Secretary Chiavetta:

We are electronically filing with the Commission this date the attached Respondent's Answer to Complaint ("Answer") on behalf of our client, Respondent Shane Transport, Inc., in connection with the above captioned case. As set forth in the Answer, Respondent is not objecting to the Commission issuing an Order, as requested in the Complaint by the Bureau of Investigation and Enforcement, revoking Respondent's Certificate of Public Convenience at Docket No. A-00122279. However, it is submitted that imposing any fine upon Respondent for any unintended violation is not warranted under the circumstances involved in this case.

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

Very truly yours,

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



David M. O'Boyle

DOB/rms  
Enclosures

cc: Michael L. Swindler, Deputy Chief Prosecutor (w/encl.)  
Shane Transport, Inc. (w/encl.)



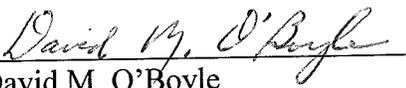
reasons, Respondent ceased its certificated motor carrier operations on or about March 19, 2015, which Respondent understands was several months before Respondent's evidence of insurance on file with the Commission was cancelled. Furthermore, Respondent was not aware of the Commission's regulations requiring 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-00122279. However, Respondent objects to the proposed penalty of \$500.00, and Respondent 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. In further response, Respondent submits that it did not intentionally violate the Commission's regulations in not filing the Application for Approval of Abandonment before Respondent ceased providing motor carrier service to the public.

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-00122279, 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 about 5 months.

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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Attorneys for Respondent  
Shane Transport, Inc.

VERIFICATION

I, Spencer Todd Christopher, hereby verify and affirm that I hold the office of President with Shane Transport, Inc. ("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: 8/19/15

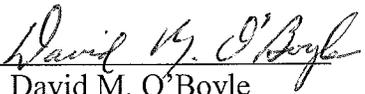
  
\_\_\_\_\_  
Spencer Todd Christopher

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

Date: August 20, 2015

  
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David M. O'Boyle