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October 8, 2015

# Via FedEx Express

Ms. Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission 400 North Street Second Floor Harrisburg, PA 17120

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OCT 8 2015

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Application of Graebel/Eastern Acquisition Movers, LLC for Transfer of Re: Household Goods Service Docketed at A-2014-2458611

Dear Ms. Chiavetta:

In regard to the above-referenced application, enclosed are an original and two copies of a Request for Reconsideration of Denial and Dismissal of Application.

Thank you for your usual courtesies. If you have any questions or comments, please contact me at your earliest convenience.

Very truly yours

Ay A. Ostendorf

Enclosures

# Pennsylvania Public Utility Commission

## Docket No. A-2014-2458611



OCT 8 2015

Re: Application of Graebel/Eastern Acquisition Movers, LLC

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

# REQUEST FOR RECONSIDERATION OF DENIAL AND DISMISSAL OF APPLICATION

Graebel/Eastern Acquisition Movers, LLC ("Graebel"), through the undersigned counsel, respectfully requests of the Pennsylvania Public Utility Commission (the "Commission") as follows:

- 1. On December 3, 2015, Graebel's application for transfer indicating a change in ownership of Household Goods In Use service (the "Application") was accepted for filing and docketed with the Commission.
- 2. During the months following the filing and docketing of the application, Graebel responded to requests of Mr. David P. Thompson of the Commission's Motor Carrier Compliance Division ("Mr. Thompson") for additional information.
- 3. On July 4, 2015, notice of the Application was published in the *Pennsylvania Bulletin*. No protests were filed with the Commission in response to such notice.
- 4. By letter dated August 12, 2015, Mr. Thompson sent an additional request for additional information in support of the Application (the "Subject Request").
- 5. The undersigned spoke and had email communications with Mr. Thompson on a couple of occasions regarding the Subject Request and the information and documents responsive to the Subject Request between the time of Graebel's receipt of the Subject Request and August 26, 2015.
- 6. Mr. Thompson was out of the office from August 27, 2015, until September 8, 2015, and Mr. Thompson returned the undersigned's call and briefly spoke with the undersigned on September 9, 2015. Through unintentional oversight, the undersigned failed to follow-up on the September 9, 2015 telephone conversation.
- 7. By letter dated September 22, 2015, notice was given that the Commission had dismissed and denied the Application for the reason that Graebel had failed to respond to the Subject Request.
- 8. Graebel is willing and able to provide the information and documentation in response to the Subject Request. It is believed that subject to Mr. Thompson's receipt and review of such information and documentation, the application was

process was nearly complete. As stated above, the failure to fully respond to the Subject Request was due to the unintentional oversight of the undersigned.

Accordingly, Graebel respectfully requests that the Commission withdraw the denial and dismissal of the Application, and permit Graebel to respond to the Subject Request.

Graebel/Eastern Acquisition Movers, LLC

ggyry A. Ostendorf

M. Market Street, Suite 1500

Indianapolis, IN 46204

(317) 492-9283

### **VERIFICATION**

I, Gregory A. Ostendorf, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: October 8, 2015

A. Ostendorf

ORIGIN ID:GSHA (317) 4 AMY GREGORY SCOPELITIS GARVIN, ET AL 10 WEST MARKET STREET SUITE 1500 INDIANAPOLIS, IN 46204 UNITED STATES US (317) 492-9273

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