PENNSYLVANIA PUBLIC UTILITY COMMISSION DUREAU OF TRAESPORTATION See Instructions before Completing Application **Application For: EMERGENCY TEMPORARY AUTHORITY** R TEMPORARY AUTHORITY EXTENSION OF EMERGENCY TEMPORARY AUTHORITY 1. TAd's Delivery Service INC +/A TON VAN Service (Name of applicant) (Trade name, if any) <u>9004</u> PENNSAUKEN HWY PENNSAUKEN NJ 08/10 (Street address) (City) (Staté & Zip Code) N/A(Name, Address & Telephone Number of Applicant's Attorney, if any) 3. Applicant is an <u>individual</u> partnership $\sqrt{}$ corporation. 4. Applicant requests authority to provide service as a <u>common or</u> <u>contract</u> carrier by motor vehicle, <u>broker or</u> <u>freight forwarder in intrastate commerce;</u> or is proposing to acquire authority by <u>transfer</u>. Give a description of type of service to be provided and area to be served: The Commodity to be transported is a complete File library center, rowsisting of more than 30,000 in ches of Files belonging to Conversal accident Insurance Co. The File library center will be relocated By truck from Allentoin PA, Lehigh county to another site in Allentoin, PA Lehigh courty. 5. Applicant does hold Pa. PUC authority under Docket No. A001092444 and (does or does not) operates as a <u>Common</u> carrier. NOV 0 8 1995

INTRY No.

838 PØ3

- 6. If this application is for temporary authority, applicant <u>does</u> <u>does not</u> have pending an application for permanent authority to perform the same service at proposed herein. If it has, give docket number, filing date and status. If applicant does not have a pending permanent application currently on file, application for permanent authority must be enclosed.
- 7. If this application is for emergency temporary authority, and not accompanied by applications for corresponding temporary and permanent authority, state when the applications for temporary and permanent authority will be filed.

The applications for temporary and permensent authority will be filed within Fifferen days. 8. "Applicant's Statement" shall be prepared by the applicant or authorized

- 8. "Applicant's Statement" shall be prepared by the applicant or authorized representative of the applicant and shall contain the information as stated at Appendix A.
- 9. "Statements of Supporting Shippers or Witnesses" shall be prepared by the shipper or witness, or an authorized representative of the shipper or witness and shall contain the information as stated at Appendix B.

Applicant further declares that:

- 10. It is aware that a grant of the requested authority will create no presumption that corresponding permanent authority will be granted.
- 11. If the requested authority is granted, applicant will comply with the tariff and insurance requirements of the Public Utility Law before beginning operation.

(Signature) Sec/Treas and General Manager

11/6/95 (Date)

AFFIDAVIT OF APPLICANT (Natural Person)
COMMONWEALTH OF PENNSYLVANIA ;
County : ss:
, being duly sworn (affirmed) according to law,
deposes and says that the facts above set forth are true and correct; or are true and correct to the best of his knowledge, information and belief and he expects to be able to prove the
same at the hearing hereof.
adhe at the heating hereot.
Signature of Affiant
Sworn and subscribed before me this
day of19
My Commission Expires
· Signature of Official Administering Oath
AFFIDAVIT OF APPLICANT (Corporation)
COMMONWEALTH OF PENNSYLVANIA :
County : ss:
Kussell G. Taddei, Jr, being duly sworn (affirmed) according to
law, deposes and says that he is Secticeas. of Ted's Delivery Sepvice.
INC HA TON VAN Service ; that he is authorized to and does make this (Neme of Corporation)
affidavit for it; and that the facts above set forth are true and correct; or are true and correct
to the best of his knowledge, information and belief and that he expects the said
Tads Delivery Service, luc + M Ten Van Service to be able to prove the same
at the hearing hereof.
Signature of Affiant
Sworn and subscribed before me this
day of 19 <u>45</u>
My Commission Expires
PAULA E. JUKEL NOTABY PUBLIC OF NEW JERSEY Signature of Official Administering Oath
A COMMISSION EXPIRES AUG. 11, 1998

838 PØS

.

THIS MUST BE COMPLETED BY NOTARY PUBLIC

CERTI	FICADE OF I	INS	URANC	E		DATE (M 3/01/9	M/DD/YY) 15
PRODUCER D.E. LOVE ASSOCIATES, INC. 301 OXFORD VALLEY ROAD SUITE 903A YARDLEY, PA 19067		THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. COMPANIES AFFORDING COVERAGE					
		T&N VAN SERVICE					
LETTER C							
9004 PENNSAUKEN HI PENNSAUKEN NJ 081		COMI LETT					
		COMI LETT					
INDICATED, NOTWITHST CERTIFICATE MAY BE IS	T THE POLICIES OF INSURANCE ANDING ANY REQUIREMENT, 1 SUED OR MAY PERTAIN, THE IN ITIONS OF SUCH POLICIES. LIN	TERM O VSURAN	R CONDITION OF A CE AFFORDED BY	NY CONTRACT OR THE POLICIES DESI	OTHER DOCUMENT WITH F CRIBED HEREIN IS SUBJECT	IESPEC	т то which thi
CO: TYPE OF INSURANCE	POLICY NUMBER			POLICY EXPIRATION DATE (MM/DD/YY)	Limits		
CENERAL LIABILITY X COMMERCIAL GENERAL LIABILITY CLAIMS MADE X OCCUR. OWNER'S & CONTRACTOR'S PROT.	CPP0863571		03/01/95	03/01/96	GENERAL AGGREGATE PRODUCTS-COMP/OP AGGR. PERSONAL & ADV. INIURY EACH OCCURRENCE FIRE DAMAGE (Any one fire) MED. EXPENSE (Any one person)	\$ \$ \$ \$ \$ \$ \$	WAIVED 1,000,000 1,000,000 1,000,000 50,000 50,000
AUTOMOBILE LIABILITY X ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS GARAGE LIABILITY	T0002027		03/01/95	03/01/96	COMBINED SINGLE LIMIT BODILY INJURY (Per person) BODILY INJURY (Per socident) PROPERTY DAMAGE	\$ \$ \$ \$	1,000,000
EXCESS LIABILITY					EACH OCCURENCE	5 5	
OTHER THAN UMBRELLA FORM							
WORKER'S COMPENSATION A EMPLOYERS' LIABILITY OTHER	WC0195551		03/01/95	03/01/96	X STATUTORY LIMITS EACH ACCIDENT DISEASE-POLICY LIMIT DISEASE-EACH EMPLOYEE	5 5 5	100,000 500,000 100,000
DESCRIPTION OF OPERATIONS/LOCATIONS/VI MOVING AND STORAGE				⁻ .			
CERTIFICATE HOLDER		SI E M L L	XPIRATION DATE T AIL <u>10</u> DAYS W EFT, BUT FAILURE	E ABOVE DESCRIBI HEREOF, THE ISSU RITTEN NOTICE TO TO MAIL SUCH NO IND UPON THE CO	ED POLICIES BE CANCELLEI ING COMPANY WILL ENDE D THE CERTIFICATE HOLDE TICE SHALL IMPOSE NO OB MPANY, ITS AGENTS OR RE	AVOR T R NAM LIGATI	o ed to the on or

		·	ra ^{ju} ' - rie;			
PRODUCER			ISSUE DATE (ML/DD/YY) 02/23/95 HON ONLY AND CONFERS NO			
CHRISTI INSURANCE GROUP 320 BICKLEY ROAD		THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EX- TEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW				
GLENSIDE, PA 1	9038	COMPANIES AFFORDING CO	VERAGE			
		COMPANY A				
CODE	SUB-CODE	CENTENNIAL INSURANCE COMPA				
VSURED T & N VAN SERV		COLIFANY				
9004 PENNSAUKE		LETTER C				
PENNSAUKEN, NE	W JERSEY 08110	LETTER D				
COVERAGES		<u></u>				
DICATED, NOTWITHSTAND TIFICATE MAY BE ISSUED	ING ANY REQUIREMENT, TERM OR OR MAY PERTAIN, THE INSURANC	ED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE I CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RE E AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT MAY HAVE BEEN REDUCED BY PAID CLAIMS.	SPECT TO WHICH THIS CER-			
O TYPE OF INSURANCE		POLICY EFFECTIVE POLICY EXPIRATION ALL DATE (MM.DD/YY) DATE (MM.DD/YY) ALL	LIMITS IN THOUSANDS			
GENERAL LIABILITY		GENERAL AGGRE	GATE			
COMMERCIAL GENERAL						
CLAIMS MADE OWNER'S 3 CONTRACTO	OCCUR.	PENSONAL & ADA EACH OCCUPRE	VERTISING INJURY			
	· · · · · · · · · · · · · · · · · · ·	FIRE DAMAGE (Ar				
		MED. EXPENSE (/	Nny one person)			
AUTOMOBILE LIABILITY		COMBINED SINGLE				
ANY AUTO		LIMIT .				
ALL OWNED AUTOS SCHEDULED AUTOS		BÓDILY INJURY				
HIRED AUTOS		(Per parson) BODILY				
NON-OWNED AUTOS		(NJURY (Per acodent)				
GARAGE LIABILITY		PROPERTY				
EXCESS LIABILITY		DAMAGE	EACH AGGREGATE			
OTHER THAN UMBRELLA	FORM					
WORKER'S COMPENSATI	ION	STATUTOR				
AND			(EACH ACCIDENT) (DISEASE — POLICY LIMIT)			
EMPLOYER'S LIABILIT	Y		(DISEASE - EACH EMPLOYE			
OTHER		\$200,000	PER TRUCK			
CARGO	259006714	03/01/95 03/01/96 \$200,000	TERMINAL			
WAREHOUSE LEGAL	259006714	03/01/95 03/01/96 \$500,000				
ESCRIPTION OF OPERATIONS LOC	ATIONS/VEHICLES/SPECIAL ITEMS					
	<u> </u>	CANCELLATION				
		SHOULD ANY OF THE ABOVE DESCRIBED POLICIES I EXPIRATION DATE THEREOF. THE ISSUING COMI MAIL. DAYS WRITTEN NOTICE TO THE CERTIFIC LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL LIABILITY OF ANY KIND YPON THE COMPANY, ITS AGE	PANY WILL ENDEAVOR TO ATE HOLDER NAMED TO THE IMPOSE NO OBLIGATION OR			
		AUTHORIZED AGORESCUT TIVE				
· · · · · · · · · · · · · · · · · · ·						

/

AGORD & 25SV.3 (4/89)



9004 Pennsauken Highway • Pennsauken, NJ 08110

1-(800) 851-6080 TEL. (609) 486-0080 FAX (609) 486-0037

November 6, 1995

PA Public Utilities Commission 231 State St. Barto Bldg., 2nd flr. Harrisburg, PA 17105-3265

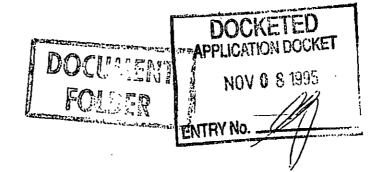
Sir or Madam,

T & N Van Service is a moving company with about ten drivers and a dozen helpers occupying about 30,000 sq. ft. The representative at T & N Van Service for purposes of this application is Russell G. Taddei, Jr and I may be reached at telephone number 609-486-0080. Our insurance documents are attached.

There are no rates under suspension at this time, nor are there any rate increaseS being applied for within the time frame of the Emergency Temporary Authority. The rates that will apply to this relocation are stated below and are the same rates which appear in our Exceptions Tariff #53, Docket #a00109244.

	Truck	Driver	Helper
8:00 a.m 5:00 p.m.	\$19.00	\$26.00	\$26.00
5:01 p.m 7:59 a.m.	\$19.00	\$39.00	\$39.00

Library Cart Rental (per Day) \$5.00



Office & Industrial Moving Specializing in Computer Equipment Relocations ATM & Bank Equipment Installation Local & Long Distance Moving

T&N VAN SERVICE

The equipment utilized on this project will include tractor trailers, ramps, dollies, flat plates, and most importantly, library carts. Our library carts hold three hundred and forty inches of accessible file space. We possess over one hundred library carts. This allows us to relocate very large file centers without needing cartons. This is why Tab Products would prefer T & N Van Service perform this relocation.

This application was not related to any action by the Commission, such as warning, road check, or investigation. T & N Van Service has a contract with Teamsters 676 at 101 Crescent Blvd., Collingswood, NJ 08109, telephone number 609-964-2101.

Sincerely, Russell G. Taddei, Jr

General Manager

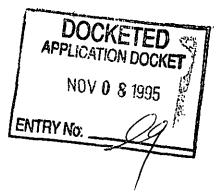


GENERAL Accident Insurance 436 Walnut Street Philadelphia PA 19105-1109 215 625,1000

November 3, 1995

Mr. Peter Marzolf PA Public Utilities Commission * Application Review Section 231 State St. Barto Blog, 2nd flr. Harrisburg, PA

Shipper Support Statement



Sir,

General Accident frequently employs the services of T & N Van Service. We have found them to be a reputable firm which provides quality service. General Accident requested T & N Van Service enter a bid on the relocation of the Alientown, PA, Lehigh County office to another site in Bethlehem, PA, Nothempton County. T & N Van Service declined to enter a proposal due to the authority issue.

With regard to the relocation of our files, however, we have concarna whoul the status of this move, as General Accident maintains an extensive file library at this location. The commodities to be relocated in this file library move include more than 30,000 incress of files and the racks on which these files are currently stored. This relocation is presently scheduled to occur between November 12th and November 19th. Having performed many of these file relocations, we have learned it is critically important to have the proper equipment, sufficient quantity of equipment, and experience handling this sort of project. The proper equipment for this project is the "library cart" which holds hundreds of inches of file space per cart and allows the files to be transferred to new racking, which can be a considerable amount of time. It is our understanding that the local movers who proposed to relocate the files are unable to perform the move as specified by Tab Products Co., who is coordinating this segment of the move.

Failure to secure the services of a mover who can perform the relocation of the file library as specified could have disastrous ramifications for General Accident. It is our experience that having unqualified movorc performing such a project could lead to extensive down time while our actively used files sit sealed in boxes, incurrance of excessive labor and Carton charges while thousands of cartons are delivered, packed,

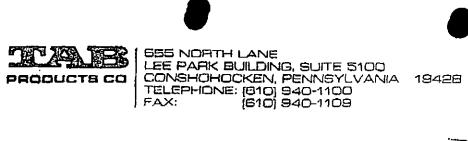
moved, unpacked, and disposed, and increased likelihood of error which will require expensive corrective efforts later.

In light of the detrimental aspects of using a mover who is not able to perform the movelus specified, we at General Accident support T & N Van Service's request to gain temporary authority to relocate our file library in Allentown, PA.

In keeping with the requirements of the Statements of Supporting Shippers, Appendixies, the following information is provided. General Accident makes moves similar to this one, though smaller in size several times a year. General Accident has not supported a request for authority by T & N Van Service in the past. General Accident, however, would support T & N Van Service's application for permanent authority. There are no unions involved with this relocation.

Sincerely,

Alison Reed Fracilities Analyst Fracilities management Dept.



November 6, 1995

Mr. Peter Marzolf PA Public Utilities Commission 231 State Street Harrisburg, PA

ON DOCKET NOV 0 8 1995 ITRY No.

Dear Mr. Marzolf:

This letter is to inform you of our decision to support T & N Van Service for the upcoming file library relocation of General Accident Insurance's records. TAB Products is coordinating this relocation of their files. Their file rooms are moving from Allentown to another facility in Bethlehem. This move is planned for the period between November, 12, 1995 and November 19, 1995.

TAB Products utilizes the services of T & N Van Service approximately six to eight times per year to relocate file rooms by truck, however, moves of this size of 30,000 filing inches are uncommon. We foresee the need for this service continuing with similar frequency. TAB Products would support a permanent authority application by T & N Van Service. TAB Products has not supported any such applications in the past. There are no labor unions involved with this relocation.

To provide some background on this move, TAB Products initially requested T & N Van Service provide us with a cost factor to do this relocation. T & N could provide the trucks, labor, and library cars necessary for this move. We also discussed this move with both Fisher-Hughes of Allentown and O'Brien Van Lines of Allentown, Both of these companies could not perform the move as specified because they lacked sufficient quantity of library carts.

If we are unable to secure the services of a mover capable of providing a sufficient quantity of library carts, the following problems would ensue: there will be extensive down time, while actively used files sit idly in moving boxes. The files remain accessible while on library carts. There will be excessive labor and carton charges for delivery, packing, moving, unpacking, and disposal of thousands of cartons. Lastly, when moving this many sequential files in this manner, there is a greater likelihood for error than when using library carts. Error will result in costly corrective efforts later. In addition, the client requested that library carts be utilized.

In as much that Allentown area movers we have contacted are unable to perform this move as specified, we hope T & N Van Service will be granted this authority.

Sincerely,

Kathy Ebert Account Manager TAB Products Company

KE:ekc



Fisher Hughes of Allentown, The O'Brien

73510 105406

5

•

NOV 02 '95 17:40 T&N VAN SERVICE

T&N VAN SERVICE

9004 Pennsauker Highway • Pennsauken, NJ 08110

1-(800) 851-6080 TEL. (609) 486-0080 FAX (609) 486-0037

CHARTERS AND MERICANNESS AND ADDRESS

November 2, 1995

Mr. Peter Marzolf Application Review Section PA Public utilities commission 231 State Street Harrisburg, PA 17101

Sir,

Pursuant to our telephone conversation on Wednesday, November 1st 1995, I am writing this letter to provide you with the information you requested. The topic of our conversation was T&N Van Service's request to aquire Temporary Emergency Authority to perform a file library move from Allentown, PA to Allentown, PA.

The service to be performed is the relocation of General Accidents File library center in Allentown, PA to another site also in Allentown, PA. The firm of Tab Products has been contracted by General Accident to facilitate the relocation of the file library center.

Tab Products will pack the files onto carts provided by the mover. Tab Products will then disassemble the existing file racks. The file racks and carts loaded with files are then delivered to the destination by the mover. At the destination, Tab Products will reconstruct the file racks and reload the files onto the racks. The mover will remove the carts at the conclusion of this phase of the move.

Tab Products had requested T&N Van Service perform this project because the local movers who submitted proposals to perform this relocation do not possess the equipment to do this job as specified. Tab Products is concerned that if an unqualified mover attempts to perform this relocation, they and the shipper, General Accident, will be unfairly harmed by manner in which the move is completed. Therefore, T&N Service has entered our request to be granted Temporary Emergency Authority being that T&N Van Service has the equipment and experience to provide this service. We would like the opportunity to serve the legitimate need of the shipper with whom we have an ongoing relationship.

Trusting this information is satisfactory,

Russell G. Taddei, Jr. General Manager

Office & Industrial Moving Specializing in Computer Equipment Relocations ATM & Bank Equipment Installation Local & Long Distance Moving

GENERAL ACCIDENT INSURANCE

436 Walnut Street Philadelphia PA 19105-1109 215 625.1000

November 3, 1995

Mr. Pater Marzolf PA Public Utilities Commission Application Review Section 231 State St. Barto Bldg, 2nd fir. Harrisburg, PA

Shipper Support Statement

Sir,

General Accident frequently employs the services of T & N Van Service. We have found them to be a reputable firm which provides quality service. General Accident requested T & N Van Service enter a bid on the relocation of the Allentown office because of our confidence in their ability. T & N Van Service declined to enter a proposal due to the authority issue.

With regard to the relocation of our files, however, we have concerns about the status of this move, as General Accident maintains an extensive file library at this location. Having performed many of these file relocations, we have learned it is critically important to have the proper equipment, sufficient quantity of equipment, and experience handling this sort of project. The proper equipment for this project is the "library cart" which holds hundreds of inches of file space per cart and allows the files to remain accessable while in transit, waiting for new racking to be built, and waiting for the files to be transferred to new racking, which can be a considerable amount of time. It is our understanding that the local movers who proposed to relocate the files are unable to perform the move as specified by Tab Shelving Co., who is coordinating this segment of the move.

Failure to secure the services of a mover who can perform the relocation of the file library as specified could have disastrous ramifications for General Accident. It is our experience that having unqualified movers performing such a project could lead to extensive down time while our actively used files sit sealed in boxes, incurrance of excessive labor and carton charges while thousands of cartons are delivered, packed, moved, unpacked, and disposed, and increased likelihood of error which will require expensive corrective efforts later.

In light of the detrimental aspects of using a mover who is not able to perform the move as specified, we at General Accident support T & N Van Service's request to gain temporary authority to relocate our file library in Allentown, PA.

Sincerely,

2

Alisa Reed Fracilities Mymt. Dopt. General Accident Insurance (o,

	CAPTION SHEED	I CAŠE MANAGEMENT SYSTEM
1.	REPORT DATE: 00/00/00	:
2.	BUREAU: TNR	:
3.	SECTION(S):	: 4. PUBLIC MEETING DATE:
5.	APPROVED BY:	: 00/00/00
	DIRECTOR:	:
	SUPERVISOR:	:
6.	PERSON IN CHARGE: MARZOLF	: 7. DATE FILED: 11/08/95
8.	DOCKET NO: A-00109244F6000	: 9. EFFECTIVE DATE: 00/00/00

	PARTY/COMPLAINANT: T/A T & N VAN	SERVICE

RESPONDENT/APPLICANT: TAD'S DELIVERY SERVICE, INC.

COMP/APP COUNTY: LEHIGH UTILITY CODE: 700268

ALLEGATION OR SUBJECT

TO TRANSPORT, AS A COMMON CARRIER BY MOTOR VEHICLE, A FILE LIBRARY FOR CENTRAL ACCIDENT INSURANCE CO., FROM ALLENTOWN, PA, LEHIGH COUNTY TO BETHLEHEM PA, LEHIGH COUNTY, From November 12, 1995, +0 November 19, 1995,

General

PENNSYLVANIA PUBLIC UTILITY COMMISSION

•.

RECEIPT The addressee named here has paid PA P.U.C. for the following bill

	•		
	TAD'S DELIVERY SERVICE INC 9004 PENNSAUKEN HIGHWAY	DATE	11/21/95
	PENNSAUKEN NJ 0 8110	RECEIPT #	191560
		AFC	EIVEN
	NOAS A BEE	NO NO	v 2 1 1995
•	In re Application of TAD'S DELIVERY SERVICE T/A T & N VAN SERVICE A-00109244, F.6000\$100.00		ETARY'S CFFICE Willity Commission
	REVENUE ACCOUNT: 001780-017601-102 CHECK NUMBER: 4732045		BTL
	· C.	Joseph Meis or Dept. of	