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December 3, 2015

VIA ELECTRONIC FILING

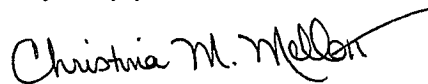
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

**Re: Application of Tyran Wheaton t/a En Route Medical Transport;
PUC Docket No. A-2015-2511414**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Protest and Request for Oral Hearing of the Protestant, *Ephrata Community Ambulance Association, Inc.* regarding the above-referenced Application. As evidenced by the attached Certificate of Service, this filing has been served on the Applicant pursuant to the Commission's rules and within the required time frame. Please let us know if you have any questions regarding this matter.

Very truly yours,



Christina M. Mellott
for PAGE, WOLFBERG & WIRTH, LLC

CMM:ms
Enclosures

cc: Tyran Wheaton t/a En Route Medical Transport
Ephrata Community Ambulance Association, Inc.

4. The Protestant, Ephrata Community Ambulance Association, Inc., holds authority from the Commission at Docket Number A-00113749, as follows:

To transport, as a common carrier, persons in paratransit service, between points in the borough of Ephrata, Lancaster County, and within an airline radius of 40 statute miles of the limits of said borough, and from points in said territory to points in Pennsylvania and return.

A true and correct copy of the Certificate of Public Convenience, evidencing this authority held by the Protestant, Ephrata Community Ambulance Association, Inc., is attached hereto as Appendix B.

5. Approval of this Application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since: (a) the Protestant presently holds authority to provide service in the area affected by the Application prior to any resolution of the Application; (b) the Protestant and other existing carriers are providing adequate service to the public in the area involved in the Application; (c) there is no need for the service proposed by the Applicant and approval of the Application will result in the diversion from existing carriers of revenue necessary to sustain their existing operations; and (d) approval of the Application will adversely affect the Protestant and other existing carriers which have a substantial investment in facilities and equipment and are willing and able to provide service in the Application area.

6. The Protestant requests that the Application be set for oral hearing and that the Applicant be required to prove by competent evidence the elements of proof required by statute and regulation. If an oral hearing is held, the Protestant will appear and present evidence of the Protestant's own operations and particular interests, unless this Application is amended so as to eliminate those interests as set forth in this Protest.

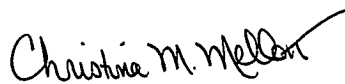
7. Pursuant to Section 333(c) of the Public Utility Code (66 Pa. C.S.A. § 333(c)), the Protestant hereby requests at list of witnesses expected to testify in the above-titled proceeding, together with the subject matter of their anticipated testimony, and, in particular, any complaints or any evidence pertaining to the service of the Protestant.

8. The Protestant knows of no amendments that would satisfy its interests in this proceeding short of eliminating the Protestant's particular interests by eliminating Lancaster County as a point of origin.

WHEREFORE, the Protestant, Ephrata Community Ambulance Association, Inc., requests that the granting of the Application be withheld; the proceeding be assigned for oral hearing with leave to the Protestant to participate fully therein; and that the Applicant be required to make available at the hearing competent witnesses for examination on all material and relevant facts bearing on the Application.

Respectfully submitted,

Dated: December 3, 2015



Christina M. Mellott, Esquire
Attorney I.D. No. 81369

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Counsel for the Protestant, Ephrata Community
Ambulance Association, Inc.

APPENDIX A

A-2015-2511414. Tyran Wheaton t/a En Route Medical Transport (5453 Garfield Avenue, Pennsauken, Camden County, NJ 08109) for the right to transport, as a common carrier, by motor vehicle, persons in paratransit service, from points in the Counties of Berks, Bucks, Chester, Delaware, Lancaster, Lehigh, Montgomery, Northampton and Philadelphia, to points in Pennsylvania and return.

**PENNSYLVANIA BULLETIN
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APPENDIX A

APPENDIX B

PENNSYLVANIA
PUBLIC UTILITY COMMISSION

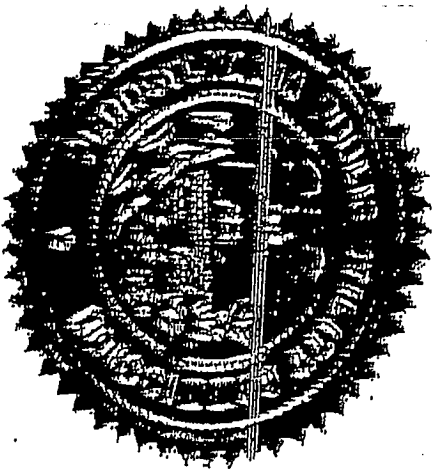
IN THE MATTER OF THE APPLICATION OF: A-00113749

EPHRATA COMMUNITY AMBULANCE ASSOCIATION, INC.,
a corporation of the Commonwealth of PA

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval to operate.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 24th day of July, 1997.

James A. McMillan
Acting Secretary



CERTIFICATE OF SERVICE

