



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

January 20, 2016

Via E-Filing

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

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and
Enforcement v. Veteran Transportation Management, LLC
Docket No. C-2015-2507335
I&E Reply to New Matter

Dear Secretary Chiavetta:

Enclosed for electronic filing is the Bureau of Investigation and Enforcement's Reply to the New Matter of Veteran Transportation Management, LLC in the above-referenced proceeding. Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephanie M. Wimer".

Stephanie M. Wimer
Prosecutor
PA Attorney ID No. 207522

Enclosures

cc: As per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	C-2015-2507335
	:	
Veteran Transportation Management, LLC,	:	
Respondent	:	

REPLY TO NEW MATTER

NOW COMES, the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission), Complainant in the above-docketed matter, by and through its prosecuting attorneys, and replies to the new matter of Veteran Transportation Management LLC (Respondent), pursuant to 52 Pa. Code § 5.63(a). In support thereof, I&E avers as follows:

6. Denied. I&E is without knowledge sufficient to form a belief as to the truth of the matters asserted and the same is therefore denied and proof thereof demanded. By way of further answer, Exhibit "A," which is purported to be a continuation certificate of Respondent's surety bond, was not attached to Respondent's Answer. Additionally, it is Respondent's obligation to maintain adequate financial security for the protection of the public and the Commission is authorized to require proof of such financial responsibility. Further, when Respondent's brokerage license was approved, Respondent was directed to notify the Commission of any changes of address. *See Application of Veteran Transportation Management, LLC, for the right, to broker the transportation of persons, between points in Pennsylvania, Docket No. A-2014-2400657 (Order entered September*

11, 2014) at 2. Any notices that may have been mailed to Respondent regarding its surety bond and were not received by Respondent are due to Respondent's own failure to apprise the Commission of the change of its address.

WHEREFORE, for all the foregoing reasons, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests that the Office of Administrative Law Judge and the Commission dismiss Respondent's New Matter and find Respondent to be in violation of the Public Utility Code and the Commission's regulations, as set forth in the Complaint.

Respectfully submitted,



Stephanie M. Wimer
Prosecutor
PA Attorney ID No. 207522

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 772-8839
stwimer@pa.gov

Dated: January 20, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement,
Complainant

v.

Veteran Transportation Management, LLC
Respondent

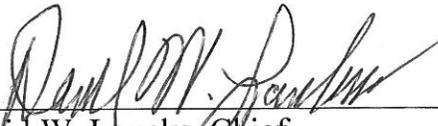
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Docket No. C-2015-2507335

VERIFICATION

I, David W. Loucks, Chief, Motor Carrier Enforcement of the Bureau of Investigation and Enforcement, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect the Bureau will be able to prove the same at any 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: January 20, 2016



David W. Loucks, Chief
Motor Carrier Enforcement
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

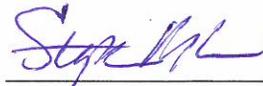
(717) 783-5010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by First Class Mail and Electronic Mail:

William A. Gray, Esq.
Vuono & Gray, LLC
310 Grant Street, Suite 2310
Pittsburgh, PA 15219-2383
wgray@vuonogray.com



Stephanie M. Wimer
Prosecutor
PA Attorney ID No. 207522

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Dated: January 20, 2016