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February 18, 2016

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

Re: Application of Reading Taxi, LLC, PUC Docket No. A-2016-2524649

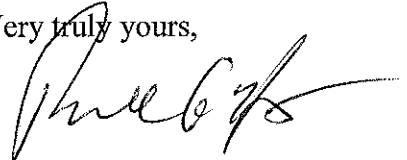
Protest of Discount Cab Service LLC t/a Berks Taxi Cab Service

Dear Secretary Chiavetta:

Enclosed for electronic filing is the Protest of Discount Cab Service LLC t/a Berks Taxi Cab Service to the above-referenced Application. A copy of this Protest is being served on the Applicant's counsel in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,



Randall G. Hurst

Enclosure

cc: H. Aly

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Reading City Cab, LLC to : Docket No. A-2016-2524649
transport persons in call and demand :
service in Berks County, Pennsylvania :

**PROTEST OF
DISCOUNT CAB SERVICE LLC
t/a BERKS TAXI CAB SERVICE**

NOW COMES Discount Cab Service LLC t/a Berks Taxi Cab Service (“Berks Taxi”) and files, pursuant to 52 Pa. Code § 3.381(c), this Protest to the above-captioned Application. In support thereof, Berks Taxi avers as follows:

1. The name of the Applicant and the Docket Number assigned to the Application are:

Reading City Cab, LLC
Docket No. A-2016-2524649

2. The name, business address and telephone number of the Protestant are:

Discount Cab Service LLC t/a Berks Taxi Cab Service
933 Iroquois Court
Harrisburg, PA 17109-4355
(717) 379-1362

3. The name, business address, telephone number and e-mail address of the Protestant’s counsel are:

Randall G. Hurst, Esq.
Mette, Evans & Woodside
3401 N Front Street
Post Office Box 5950
Harrisburg, PA 17110
(717) 231-5215
rghurst@mette.com

4. Berks Taxi holds Pennsylvania Public Utility Commission call or demand authority under Authorization Number A-6310309. A copy of the Protestant’s Certificate of Public Convenience is attached hereto as Exhibit “A.”

5. Berks Taxi is authorized to provide call or demand service in Berks County, Pennsylvania. The Applicant is seeking authority to provide call or demand service in Berks County, Pennsylvania. Accordingly, the Applicant seeks to provide call or demand service in the same territory as Berks Taxi. Approval of the Application is neither necessary nor proper for the service, accommodation, convenience or safety of the public since (a) Berks Taxi already has authority to provide such service in the same territory sought in the Application; (b) Berks Taxi and other authorized call or demand carriers are already providing adequate and satisfactory service to the public in the territory sought for approval; (c) there is no public need for additional call or demand service in the City of Reading; and (d) approval of the Application may result in excessive competition, and diversion and dilution of revenues among the existing carriers so that they may become unable to sustain current levels of service, thereby harming the public. Moreover, the information in the Application is insufficient to determine the Applicant's financial and technical fitness to provide the service requested in the territory sought. Therefore, the Applicant may not possess the requisite fitness to provide the service sought in the Application.

6. Berks Taxi requests that the Application be subject to a hearing and that the Applicant be required to prove by competent evidence the elements of proof required by statute.

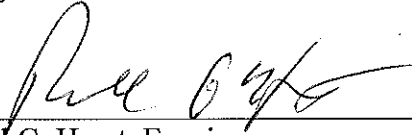
7. Berks Taxi is unaware of any potential settlement terms that will satisfy its interests.

WHEREFORE, Berks Taxi requests that: (1) the granting of the Application be withheld; (2) the Application be assigned for a formal hearing on the merits with leave for Protestant to participate as a party thereto; and (3) the Applicant be required to present at the hearing all evidence and witnesses for examination on all material and necessary facts bearing on the Application.

Respectfully submitted,

Discount Cab Service LLC t/a Berks Taxi Cab
Service

By:



Randall G. Hurst, Esquire
Sup. Ct. I.D. No. 83931

3401 North Front Street
P. O. Box 5950
Harrisburg, PA 17110-0950
(717) 232-5000 - Phone
(717) 236-1816 - Fax

Attorneys for Discount Cab Service LLC t/a Berks
Taxi Cab Service

Date: *Feb 18, 2016*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Reading Taxi, LLC

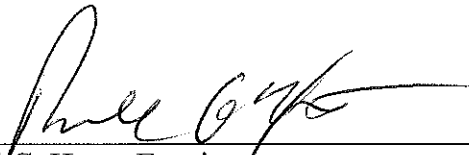
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Docket No. A-2016-2524649

CERTIFICATE OF SERVICE

I hereby certify that I have served on this date the foregoing Protest of Discount Cab Service LLC t/a Berks Taxi Cab Service on the persons identified below by posting the same in the United States Mail, postage prepaid, and addressed as follows:

John W. Sweet, Esq.
Law office of John W. Sweet
620 South 13th Street
Harrisburg, PA 17104
Counsel for Applicant



Randall G. Hurst, Esquire

Dated: *Febry 18, 2016*

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

IN THE MATTER OF: A-6310309

Application of Discount Cab Service, LLC, a limited liability corporation of the Commonwealth of Pennsylvania, for the right to begin To transport, as a common carrier, by motor vehicle, persons, by motor vehicle, in call or demand service, in Berks County. A-2010-2195541

EFFECTIVE DATE: August 1, 2014

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 1st day of August, 2014.



Rosemary Hewitt
Secretary

EXHIBIT "A"