

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: A-2015-2520130
Metro Transportation, LLC (207 West Sun Hill Road, Manheim, Lancaster County,
PA 17545) for Approval to Begin Operating as Common Carriers for
Transportation in call or demand service, in the City of Reading, Berks County.

Pennsylvania Bulletin Reference: January 30, 2016
46 Pa. B. 632

PROTEST OF
READING YELLOW CAB, INC.
A.00109547 F.1, Am-A

RECEIVED
2016 FEB 12 AM 9:38
PA.P.U.C.
SECRETARY'S BUREAU

1. The name, address and telephone number of Protestant is:

Reading Yellow Cab, Inc.
615 Elm Street
Reading, PA 19601
Telephone: 610-373-8666

2. The name, address and telephone number of Protestant's attorney is:

Stephen G. Welz, Esquire
LAW OFFICES OF STEPHEN G. WELZ, P.C.
999 Berkshire Blvd., Suite 290
Wyomissing, PA 19610-1254
Telephone: 610-378-5272

3. Protestant possesses authority of A.00109547, summary attached as Exhibit "A"
& "B";

Under these rights, Protestant has been for many years providing full service,
which is identical to the service which Applicant seeks to provide to, from and between
points in the County of Berks.

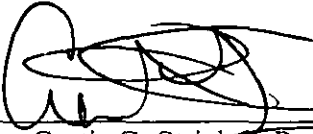
The subject area is already served by at least 5 licensees plus 3 car services and unauthorized carriers, and there is no need for additional service.

4. Without knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be prepared. In addition, Protestant requires additional information regarding applicant's fitness, financially and otherwise.
5. Protestant holds out to perform and does perform an adequate and satisfactory service, and diversion of its revenue would be extremely adverse to this Protestant, and would be adverse to call and demand service presently being rendered in Berks County.
6. Protestant knows of no amendment which will satisfy its interests in this proceeding.
7. Absent an appropriate amendment and pursuant to Section 333 (c) of the Public Utility Law, Protestant requests that Applicant furnish it and its counsel a list of the names and addresses of all witnesses Applicant intends to call.

Absent an appropriate amendment, Protestant prays the application may be dismissed.

AND IT WILL EVER PRAY.

Reading Yellow Cab, Inc.

By: 
Curtis G. Stricker, President

DATED: February 11, 2016

COPY

Certificate No. A.00109547
F. 1,Am-A

Call or Demand PA PUC No. 3
cancels
Call or Demand PA PUC No. 2

READING YELLOW CAB, INC.

RATES AND RULES
GOVERNING THE
TRANSPORTATION OF PERSONS

OPERATING AUTHORITY:

To transport, as a common carrier, persons
upon call or demand in the County of Berks

ISSUED June 18, 2007

EFFECTIVE July 18, 2007

By: Curtis G. Stricker, President
615 Elm Street
Reading, Pennsylvania 19601
(610) 373-8666
(610) 374-5111

(1)

EXHIBIT A

COPY

CERTIFICATE NO. A.00109547
F.3

Paragransit PA PUC No. 1

READING YELLOW CAB, INC.

PARATRANSIT TARIFF
RATES AND RULES
GOVERNING THE TRANSPORTATION,
AS A COMMON CARRIER,
OF PERSONS IN PARATRANSIT SERVICE,
BETWEEN POINTS IN THE COUNTY OF BERKS,
AND FROM POINTS IN SAID COUNTY,
TO POINTS IN PENNSYLVANIA, AND RETURN

Issued: December 23, 2003 Effective: December 24, 2003

Issued under authority of PA. Code, Title 52, Section 23.42

ISSUED BY:

Curtis G. Stricker, President
Reading Yellow Cab, Inc.
615 Elm Street
Reading PA 19601
(610) 373-8666

EXHIBIT B

RULES AND REGULATIONSOPERATING AUTHORITY

To transport, as a common carrier, persons in paratransit service, between points in the County of Berks, and from points in said County, to points in Pennsylvania, and return.

NON-EXCLUSIVE, ADVANCE RESERVATIONS

Service will be provided on a non-exclusive basis, and reservations must be made prior to service being rendered.

COMPUTATION OF MILEAGE

Mileage shall be determined by the actual reading on the odometer of the specific vehicle used for transportation, beginning when the passenger boards the vehicle and ending when the passenger is discharged at final destination.

BAGGAGE AND EQUIPMENT

Baggage and equipment is limited to the capacity of the vehicle, and baggage and equipment will be transported at no additional charge.

WAITING TIME

Chargeable waiting time will be assessed in 15 minute increments. Carrier will hold its vehicle upon request to pick up passengers for back haul or return trip.

RULES (Continued)

CONTRACT SERVICES

Contract services provided will be for a term of not less than 30 days for prequalified persons under a federal, state, county or municipal governmental agency contract. Rates for the services will be specified in the respective contracts, copies of which, including any amendments thereto, are to be filed with the Commission as executed to become effective on one day's notice.

CANCELLED TRIP

In the event a vehicle is dispatched for a trip, but the vehicle is not used, the base rate charge will be applied for a cancelled trip, in addition to the mileage rate from the Company's dispatch office to the point of origin of the trip.

SCHEDULE OF RATES PER PERSON

Base Rate	\$25.00
Mileage Rate (applies in addition to the Base Rate stated above) -	
Per Mile or fraction thereof	\$1.50
Waiting Time -	
Each 15 minutes or fraction thereof	\$8.00

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Metro Transportation, LLC (207 West Sun Hill :
Road, Manheim, Lancaster County, PA 17545) : A-2015-2520130
for Approval in call or demand service, in the City :
of Reading, Berks County :

CERTIFICATE OF SERVICE

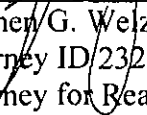
I HEREBY CERTIFY that I have this date served a true and correct copy of the foregoing Protest of Reading Yellow Cab, Inc. to the Application of METRO TRANSPORTATION, LLC, in accordance with the requirements of Subsection 1.54, by regular U.S. Mail, as follows:

Metro Transportation, LLC
207 West Sun Hill Road
Manheim PA 17545

LAW OFFICES OF STEPHEN G. WELZ, P.C.

DATED: February 11, 2016

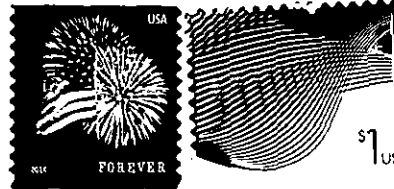
By: _____


Stephen G. Welz, Esquire
Attorney ID 23280
Attorney for Reading Yellow Cab, Inc.
999 Berkshire Blvd., Ste 290
Wyomissing PA 19610-1254
(610) 378-5272 – telephone
(610) 378-1804 - telefax
sgwelz@welzlaw.com

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2016 FEB 12 AM 9:39

PA.P.U.C.
SECRETARY'S BUREAU



**LAW OFFICES OF
STEPHEN G. WELZ, P.C.
999 BERKSHIRE BOULEVARD, SUITE 290
WYOMISSING, PA 19610-1254**

TO:

Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17120