

LAW OFFICES OF
STEPHEN G. WELZ
A PROFESSIONAL CORPORATION

STEPHEN G. WELZ
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SUITE 290
WYOMISSING, PENNSYLVANIA 19610-1254

TELEPHONE (610) 378-5272
TELEFAX (610) 378-1804

February 17, 2016

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

Re: Protest of Reading Checker Cab, Inc.
To Application of Reading City Cab, LLC
A-2016-2524649

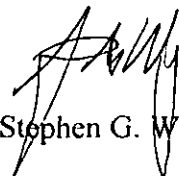
Dear Sir or Madam:

Please accept this letter as my entry of appearance on behalf of Reading Checker Cab, Inc. Enclosed for filing are two copies of the Protest of Reading Checker Cab, Inc. to the application of Reading City Cab, LLC as an in call and demand service, which I am filing on behalf of my client.

By way of copy of this letter and enclosure, a copy of this Protest is being served upon John W. Sweet, Esquire, Attorney for the Applicant.

Very truly yours,

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


Stephen G. Welz

SGW/alw

Enclosures

Cc: John W. Sweet, Esquire,
Attorney for Reading City Cab, LLC
(w/enclosure)

PA P.U.C.
SECRETARY'S BUREAU

2016 FEB 18 AM 9:40

RECEIVED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: A-2016-2524649

Reading City Cab, LLC (2304 Walnut Street, Harrisburg, PA 17104) for the right, to transport, by motor vehicle, persons, upon call or demand, from points in Berks County to points in Pennsylvania, and return.

Pennsylvania Bulletin Reference: February 13, 2016
46 Pa.B. 836

PROTEST OF
READING CHECKER CAB, INC.
A.00121381

PA PUC
SECRETARY'S BUREAU

2016 FEB 18 AM 9:40

RECEIVED

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

Reading Checker 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.00121381, summary attached as Exhibit "A";

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 five licensees, plus three 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.

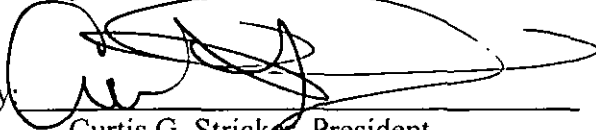
Absent an appropriate amendment, Protestant prays the application may be dismissed.

AND IT WILL EVER PRAY.

DATED:

2-16-16

Reading Checker Cab, Inc.

By: 
Curtis G. Stricker, President

RECEIVED
2016 FEB 18 AM 9:40
PA P.U.C.
SECRETARY'S BUREAU

RECEIVED

COPY

2016 FEB 18 AM 9:41

PA P.U.C.
SECRETARY'S BUREAU

Certificate No. A.00121381

Call and Demand PA PUC No. 2

Cancel

Call and Demand PA PUC No. 1

READING CHECKER 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

RECEIVED

2016 FEB 18 AM 9:41

PA P.U.C.
SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Reading City Cab, LLC,	:	
(2304 Walnut Street, Harrisburg, PA 17104)	:	A-2016-2524649
for the right, to transport by motor vehicle,	:	
persons, upon call or demand, from points	:	
in Berks County to points in Pennsylvania,	:	
and return.	:	


CERTIFICATE OF SERVICE

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

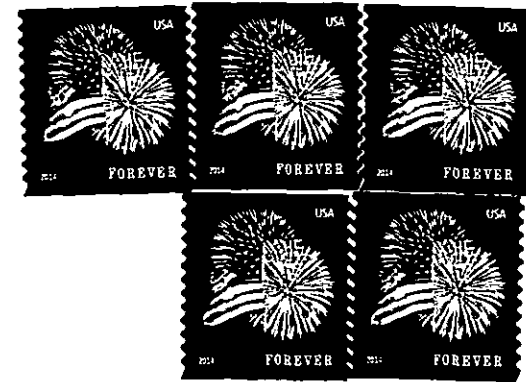
John W. Sweet, Esquire
Attorney for Reading City Cab, LLC
620 South 13 Street
Harrisburg, PA 17104

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

DATED: 2/17/16

By: 

Stephen G. Welz, Esquire
Attorney ID 23280
Attorney for Reading Checker 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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STEPHEN G. WELZ, P.C.
999 BERKSHIRE BOULEVARD, SUITE 290
WYOMISSING, PA 19610-1254

TO:

Pennsylvania Public Utility Commission
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Harrisburg, PA 17120