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A PROFESSIONAL CORPORATION

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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 Metro Taxi Cab, Inc.
To Application of Reading City Cab, LLC
A-2016-2524649

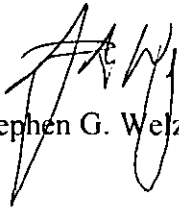
Dear Sir or Madam:

Please accept this letter as my entry of appearance on behalf of Reading Metro Taxi Cab, Inc. Enclosed for filing are two copies of the Protest of Reading Metro Taxi 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)

RECEIVED
2016 FEB 18 AM 9:42
PA P.U.C.
SECRETARY'S BUREAU

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 METRO TAXI CAB, INC.
A.101102

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

Reading Metro Taxi 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.101102, summary attached as Exhibit "A;

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SECRETARY'S BUREAU

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.

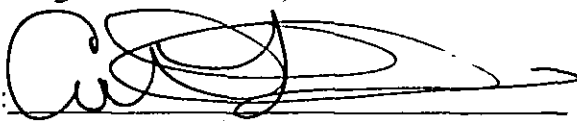
4. Without knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be prepared. In addition, Protestant requires additional information regarding applicant's fitness, financially and otherwise.
5. Protestant holds out to perform and does perform an adequate and 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 Metro Taxi Cab, Inc.

By: 
Curtis G. Stricker, President

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COPY

Certificate No. A.101102

Call and Demand PA PUC No. 7
Cancels
Call and Demand PA PUC No. 6

READING METRO TAXI CAB INC.

OPERATING AUTHORITY:

Folder 1

To transport, as a common carrier, by motor vehicle, persons upon call or demand in the City of Reading, Berks County, and within ten (10) miles of the Courthouse in said City;

Folder 2

To transport, as a common carrier, by motor vehicle, persons upon call or demand in the City of Reading, Berks County, and within a radius of ten (10) miles of the corporate limits of the said City, including the boroughs of Birdsboro, Kenhorst, Laureldale, Mohnnton, Mt. Penn, Robeson, Shillington, Sinking Springs, St. Lawrence, Temple, Wernersville, West Lawn, West Leesport, West Reading and Wyomissing, and the townships of Exeter, Spring and Bern, Berks County

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

EXHIBIT A

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2016 FEB 18 AM 9:43

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.	:	

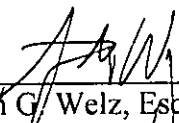
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served a true and correct copy of the foregoing Protest of Reading Metro Taxi 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 Metro Taxi Cab, Inc.
999 Berkshire Blvd., Ste. 290
Wyomissing, PA 19610-1254
(610) 378-5272 – telephone
(610) 378-1804 – telefax
sgwelz@welzlaw.com