

SCHUBERT ♦ GALLAGHER



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March 28, 2016

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

**Re: Application of Joel Sicherman, t/a Bestdarnmovers.  
PUC Docket No.: A-2016-2532991**

RECEIVED  
2016 APR -4 AM 9:45  
PA P.U.C.  
SECRETARY'S BUREAU

Dear Ms. Chiavetta:

Please be advised that this office represents Matheson Transfer Company. Accordingly, I enclose herewith an original Protest of our client to the above captioned Application.

Kindly acknowledge receipt of the enclosure by time-stamping the enclosed copy of this letter and returning to me in the self-addressed, stamped envelope provided.

Respectfully submitted,

Richard T. Mulcahey, Jr.

RTMJR/hs  
Enclosures

cc: Joel Sicherman, t/a Bestdarnmovers. (w/encls.)  
Matheson Transfer Company (w/encls.)



other carriers of customers and to divert revenues which are essential to the maintenance of an adequate and safe transportation system.

5. Applicant does not possess the technical and financial ability to provide the proposed service and lacks a propensity to operate safely and legally and, therefore, does not have the fitness to be granted a Certificate of Public Convenience by Your Honorable Commission. Specifically:

(a) Applicant has not shown or demonstrated that it possesses the pertinent terminal facilities and communication network for the proposed service.


(b) Applicant has not shown or demonstrated that it has pertinent equipment and vehicles for the proposed service.

(c) Applicant has not shown or demonstrated that it possesses the pertinent safety program for the proposed service or that it will be able obtain a satisfactory safety rating.

(d) Applicant has not shown or demonstrated that it has the pertinent financial wherewithal to operate the proposed service.

(e) Applicant has not shown or demonstrated that it has a minimum of two (2) years experience with a licensed household goods carrier or the equivalent necessary for successful new operations.

Respectfully submitted,

By:   
RICHARD T. MULCAHEY, JR.  
SCHUBERT, GALLAGHER,  
TYLER & MULCAHEY  
Attorneys for Protestant

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PA P.U.C.  
SECRETARY'S BUREAU

**Matheson Transfer Company**  
**PUC Docket No. A-00068360**

To transport, as a common carrier, household goods in use, between points in the Commonwealth of Pennsylvania.

**EXHIBIT "A"**

**CERTIFICATE OF SERVICE**

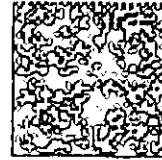
I, Richard T. Mulcahey, Jr., Esquire, hereby certify that on 3/28/16, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of Matheson Transfer Company to:

Joel Sicherman, t/a  
Bestdarnmovers  
210 Division Street  
Kingston, PA 18704

DATE: 3/28/16

  
\_\_\_\_\_  
RICHARD T. MULCAHEY, JR., ESQ.

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LAW OFFICES

**SCHUBERT ♦ GALLAGHER**

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**TO:**

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Pennsylvania Public Utility Commission  
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