

1. REPORT DATE: 00/00/00 :  
 2. BUREAU: TAS :  
 3. SECTION(S) : 4. PUBLIC MEETING DATE:  
 5. APPROVED BY: : 00/00/00  
 DIRECTOR: :  
 SUPERVISOR: :  
 6. PERSON IN CHARGE: DEITRICH : 7. DATE FILED: 04/10/02  
 8. DOCKET NO: A-00113654C0201 : 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: TRANSPORTATION & SAFETY BUREAU OF

RESPONDENT/APPLICANT: BROWN, C., INC.

COMP/APP COUNTY:

UTILITY CODE: 702307

ALLEGATION OR SUBJECT

FAILED TO FILE ABAND/DISCONT. FORM BEFORE ABANDAMENT OF SERVICE.

DOCUMENT  
FOLDER

DOCKETED  
APR 29 2009

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION  
BUREAU OF TRANSPORTATION AND SAFETY

V.

DOCKET NO. A-00113654C020/  
A-00113654

C. Brown, Inc.

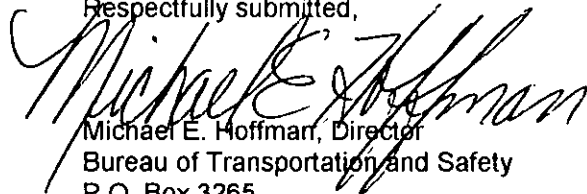
COMPLAINT

The Pennsylvania Public Utility Commission (Commission) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Transportation and Safety and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Transportation and Safety Prosecutory Staff hereby represents as follows:

1. That C. Brown, Inc., respondent, maintains its principal place of business at 100 West Central Avenue, Paoli, PA 19301.
2. That respondent was issued a certificate of public convenience by this Commission on February 27, 1997 at Application Docket No. A-00113654.
3. That respondent abandoned or discontinued service without having first submitted a letter to this Commission containing a statement that the service is no longer being rendered. Respondent has not reported intrastate revenue for the years 1999, 2000 and 2001.
4. That respondent, by failing to submit a letter to this Commission containing a statement that the service is no longer being rendered, violated 52 Pa. Code §3.381(a)(5) and, by failing to maintain adequate, efficient and safe service and facilities, violated 66 Pa. C.S. §1501.

WHEREFORE, the Bureau of Transportation and Safety Prosecutory Staff hereby requests that the Commission revoke **C. Brown, Inc.'s Certificate of Public Convenience at A-00113654.**

Respectfully submitted,



Michael E. Hoffman, Director  
Bureau of Transportation and Safety  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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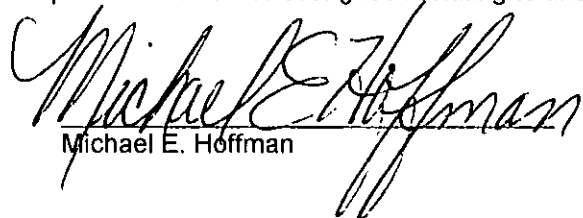
PA PUC  
SECRETARY'S BUREAU

VERIFICATION

I, Michael E. Hoffman, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date:

4/8/02



Michael E. Hoffman

NOTICE

A. You must file an answer within twenty days of the date of service of this Complaint. The date of service is the mailing date, as indicated at the top of the Secretarial Cover Letter for this Complaint and Notice, 52 Pa. Code §1.56(a). An answer is a written explanation of circumstances wished to be considered in determining the outcome. The answer shall raise all factual and legal arguments that you wish to claim in your defense and must include the reference number of this Complaint. Your answer must be verified and the original and three copies sent to:

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

B. If you fail to answer this Complaint within twenty days, the Bureau of Transportation and Safety will request that the Commission issue a Secretarial Letter imposing a penalty, which will include the revocation of your Certificate of Public Convenience.

C. If you file an answer which admits or fails to deny the allegations of the Complaint, the Bureau of Transportation and Safety will request that the Commission issue a Secretarial Letter imposing a penalty, which may include the revocation of your Certificate of Public Convenience.

D. If you file an answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision.

E. Alternative formats of this material are available, for persons with disabilities, by contacting the Compliance Office at 717-787-1168.

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG PA 17105-3265

Date of Service: APRIL 29, 2002  
Docket Number: A-00113654C0201

C BROWN INC  
100 WEST CENTRAL AVENUE  
PAOLI PA 19301

**Pennsylvania Public Utility Commission Bureau of Transportation and Safety**

v.  
**C BROWN INC**

Dear Sir/Madam:

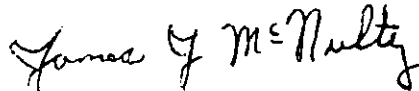
The Pennsylvania Public Utility Commission has delegated its authority to initiate prosecutory proceedings to several bureaus in the Commission with enforcement responsibilities.

Pursuant to this delegated authority and Section 701 of the Public Utility Code, the Bureau of Transportation and Safety Prosecutory Staff has filed the attached complaint against you.

Please refer to the Notice page at the conclusion of this complaint for detailed instructions on how to proceed. Alternative formats of this material are available for persons with disabilities.

Any questions may be directed to the Technical Review Section of the Bureau of Transportation and Safety at (717) 787-1168.

Very truly yours,



James J. McNulty  
Secretary

ddi

# MEMO

October 28, 2003

**Subject:** **Withdrawal of Complaint** – A-00113654C0201  
Pennsylvania Public Utility Commission  
v.  
C. Brown, Inc.

**To:** James J. McNulty, Secretary

**From:** Mari Jo Rudy

DOCUMENT  
FOLDER

Please be advised that the Bureau of Transportation and Safety  
Prosecutory Staff is withdrawing the complaint in the above-captioned matter.

It is also requested that a copy of the Secretarial letter withdrawing the  
complaint and closing the record be sent to:

Tim Zeigler, Manager  
Compliance Office  
Bureau of Transportation and Safety

so that we may close our records. Thank you.

mjr

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03 NOV 13 AM 10:02  
P.A.P.U.C.  
SECRETARY'S BUREAU

DOCKETED  
DEC 17 2003