



133090

DOCUMENT PILLAR · MULROY & FERBER
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98 FEB 17 AM 10:37

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PROTHONOTARY'S OFFICE

February 12, 1998

Re: Jenks, Inc., t/a
George P. Carroll Moving Company
Docket No. A-00113657, F.1, Am-A

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

Dear Mr. McNulty:

We enclose for filing the original **Certificate of Service** in connection with interrogatories served on applicant in the above docketed proceeding.

Very truly yours,

JOHN A. PILLAR

SW

Enclosure

cc: Hon. Larry Gesoff (w/encl.)
David M. O'Boyle, Esq. (w/encl.)
William A. Gray, Esq. (w/encl.)
Patrick Kissell, Sr. (w/encl.)
Debo Moving and Storage, Inc. (w/encl.)
George Transportation Company (w/encl.)

Before the ^{09 FEB 17 10:37}
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT
FOLDER

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REGISTRATION OFFICE

Application of
JENKS, INC., t/a
GEORGIA P. CARROLL MOVING COMPANY

Docket No. A-00113657, F.1, Am-A

CERTIFICATE OF SERVICE

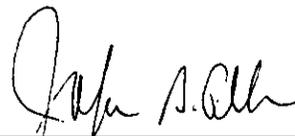
I hereby certify that I have served **Interrogatories Directed to Applicant** upon the following parties by first-class mail, postage prepaid, this 12th day of February, 1998:

DAVID M. O'BOYLE, ESQ.
1450 Two Chatham Center
Pittsburgh, PA 15219

WILLIAM A. GRAY, ESQ.
Vuono & Gray
2310 Grant Building
Pittsburgh, PA 15219

PATRICK KISSELL, SR.
550 Pinecreek Road
Wexford, PA 15090

DOCKETED
FEB 20 1998



JOHN A. PILLAR, ESQ.
Attorney for
DEBO MOVING AND STORAGE,
INC. and
THE SNYDER BROTHERS MOVING,
INC., t/a GEORGE
TRANSPORTATION COMPANY,
Protestants

LAW OFFICES

WICK, STREIFF, MEYER, McGRAIL & O'BOYLE, P.C.

HENRY M. WICK, JR.
CHARLES J. STREIFF
CARL P. MEYER
PATRICIA L. McGRAIL
DAVID M. O'BOYLE
VINCENT P. SZEJIGO
LUCILLE N. WICK
DOUGLAS P. SPENCE
JOHN M. SMITH
RICHARD T. SCHADLE

1450 TWO CHATHAM CENTER
PITTSBURGH, PA 15219-3427
(412) 785-1800

FACSIMILE
(412) 281-9783

E-MAIL
wsm770@spl.net

1714 LINCOLN WAY
WHITE OAK, PA 15121-1710
(412) 684-4433

DUFF OFFICE CENTER, SUITE 208
10 DUFF ROAD
PITTSBURGH, PA 15235-3208
(412) 241-7227

March 23, 1998

Re: Application of Jenks, Inc., t/d/b/a
Georgia P. Carroll Moving Company
Docket No. A-00113657, P.1, Am-A
Our File 6117.003

Honorable Robert A. Christianson
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

VIA FACSIMILE (717) 787-0481

Dear Chief Judge Christianson:

Please find attached hereto a copy of the signed Restrictive Amendment and Withdrawals of Protests in connection with the above captioned case. All of the Protestants in this application case have agreed to withdraw their opposition to the application, conditioned upon the Commission accepting the Restrictive Amendment and any grant of authority issued by the Commission being consistent with the Restrictive Amendment. Accordingly, we request that the Commission cancel the initial hearing in this case, which is scheduled for Wednesday, March 25, 1998. We will file the signed originals of the enclosed documents as soon as we receive the signed Withdrawal of Protests from Protestants.

On behalf of Applicant, we request that this application be transferred to the Application and Review Section for handling on a non-hearing basis.

A copy of this letter and the Restrictive Amendment and Withdrawal of Protests are being served upon Administrative Law Judge Larry Gesoff and all parties of record.

Very truly yours,

WICK, STREIFF, MEYER,
McGRAIL & O'BOYLE, P.C.

David M. O'Boyle
David M. O'Boyle

PROTHONOTARY'S OFFICE

98 MAR 26 AM 9:29

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DOB/pac
Enclosure

cc: Honorable Larry Gesoff, ALJ (w/encl.)
William A. Gray, Esquire (w/encl.)
John A. Pillar, Esquire (w/encl.)
Mr. Patrick A. Kissel, Sr. (w/encl.)
Georgia P. Carroll Moving Company (w/encl.)

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of
JENKS, INC., t/d/b/a
GEORGIA P. CARROLL MOVING COMPANY

Docket No. A-00113657, F.1, Am-A

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93 MAR 26 AM 9:21
PUBLIC
PROTHONOTARY'S OFFICE

**RESTRICTIVE AMENDMENT AND
WITHDRAWAL OF PROTESTS**

1. Jenks, Inc., t/d/b/a Georgia P. Carroll Moving Company hereby restrictively amends its application in the above captioned case to read as follows:

To transport, as a common carrier by motor vehicle, household goods in use, for the Housing Authority of the City of Pittsburgh, Allegheny County Housing Authority, Negley Corner Limited Partnership, Housing Opportunities Unlimited, LLM-7 Cleaning Company, Inc. and Bedford Dwelling Resident Council, between points in the county of Allegheny, and from points in said county to points in the counties of Beaver, Butler, Greene, Washington, and Westmoreland, and vice versa;

Subject to the following conditions:

Provided that no right, power or privilege is granted to provide service between points in the City of Pittsburgh, Allegheny County.

2. Based upon the foregoing Restrictive Amendment, and conditioned upon the acceptance of the Restrictive Amendment by the Commission and any grant of authority being consistent with the Restrictive Amendment, all of the Protestants in this proceeding are hereby withdrawing their protests and attached hereto as Appendices are the Withdrawals of Protests on behalf of the Protestants.

Counsel for Protestants and Protestant Patrick Kissel, Sr., who is not represented by counsel, will remain a party of record for the purpose of receiving copies of all notices and

orders issued in this proceeding. The names of the representatives of the parties who shall remain of record, along with the Appendix reference to their Withdrawal of Protest, are set forth below:

William A. Gray, Esquire
Vuono & Gray LLC
2310 Grant Building
Pittsburgh, PA 15219

John A. Pillar, Esquire
Pillar Mulroy & Ferber, P.C.
1106 Frick Building
Pittsburgh, PA 15219

Patrick A. Kissel, Sr.
550 Pine Creek Road
Wexford, PA 15090

APPENDIX "A"

McKean & Burt, Inc. t/d/b/a
All Ways Moving & Storage
Anderson Transfer, Inc.
Weleski Transfer, Inc.
O.H. Nicholas Transfer & Storage Co.
Vesely Bros. Moving & Storage, Inc.
Century III Moving Systems, Inc. t/b/d/a
Clairton Transfer Company and
Pleasant Hills Van & Storage
South Hills Movers, Inc.
Leelease, Inc.
B.H. Stumpf Co., Inc.
Fife Moving & Storage Co.
Best Moving & Storage Co.
Forest Hills Transfer and Storage, Inc.

APPENDIX "B"

Debo Moving and Storage, Inc.
The Snyder Brothers Moving, Inc., t/a
George Transportation Company

APPENDIX "C"

Patrick Kissel, Sr.

Dated at Pittsburgh, Pennsylvania this 20th day of March, 1998.

Jenks, Inc., t/b/d/a
Georgia P. Carroll Moving Company

By: David M. O'Boyle
David M. O'Boyle, Esquire
1450 Two Chatham Center
Pittsburgh, PA 15219
(412) 765-1600
Counsel for Applicant

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of
JENKS, INC., t/d/b/a
GEORGIA P. CARROLL MOVING COMPANY

Docket No. A-00113657, F.1, Am-A

APENDIX "A"

WITHDRAWAL OF PROTESTS

Protestants McKean & Burt, Inc., t/d/b/a All Ways Moving & Storage, Anderson Transfer, Inc., Weleski Transfer, Inc., O.H. Nicholas Transfer & Storage Co., Vesely Bros. Moving & Storage, Inc., Century III Moving Systems, Inc., t/b/d/a Clairton Transfer Company and Pleasant Hills Van & Storage, South Hills Movers, Inc., Leelease, Inc., B.H. Stumpf Co., Inc., Fife Moving & Storage Co., Best Moving & Storage Co., and Forest Hills Transfer and Storage, Inc., by and through their counsel, William A. Gray, Esq., hereby withdraw their protests to the above-captioned application based upon the Restrictive Amendment to which this Withdrawal of Protests is attached.

Dated: 3/23/98

By: 
William A. Gray, Esquire
Vuono & Gray LLC
2310 Grant Building
Pittsburgh, PA 15219

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of
JENKS, INC., v/d/b/a
GEORGIA P. CARROLL MOVING COMPANY

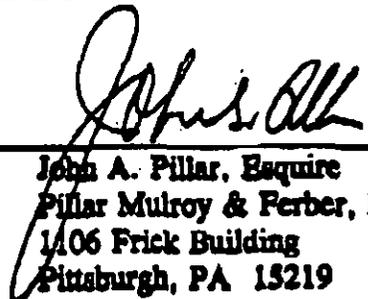
Docket No. A-00113657, F.1, Am-A

APENDIX "B"

WITHDRAWAL OF PROTESTS

Debo Moving and Storage, Inc., and The Snyder Brothers Moving, Inc., v/a George Transportation Company, by and through their counsel, John A. Pillar, Esq., hereby withdraw their protests to the above-captioned application based upon the Restrictive Amendment to which this Withdrawal of Protests is attached.

Dated: 3-23-98

By: 
John A. Pillar, Esquire
Pillar Mulroy & Ferber, P.C.
1106 Frick Building
Pittsburgh, PA 15219

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of
JENKS, INC., v/d/b/a
GEORGIA P. CARROLL MOVING COMPANY

Docket No. A-00113657, F.1, Am-A

APENDIX "C"

WITHDRAWAL OF PROTEST

Protestant Patrick Kissel, Sr. hereby withdraws his protest to the above-captioned application based upon the Restrictive Amendment to which this Withdrawal of Protest is attached.

Dated: 3-23-98

By: Patrick A Kissel, Sr.
Patrick Kissel, Sr.
550 Pine Creek Road
Wexford, PA 15090

LAW OFFICES

WICK, STREIFF, MEYER, McGRAIL & O'BOYLE, P.C.

1450 TWO CHATHAM CENTER

PITTSBURGH, PA 15219-3427

FACSIMILE COVER LETTERFROM: David M. O'Boyle, ESQ.DATE: March 23, 1998TOTAL NUMBER OF PAGES: 7 (Including Cover Sheet)

TO THE FOLLOWING:

<u>NAME</u>	<u>FIRM/COMPANY</u>	<u>FAX NO.</u>	<u>TIME SENT</u>
Chief Judge Robert A. Christianson	Pennsylvania Public Utility Commission	(717) 787-0481	3:45pm

COMMENT/MESSAGE:

Return Facsimile Number: (412) 261-3783

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE ADDRESSEE AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED AND CONFIDENTIAL. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE. THANK YOU.

If transmission is incomplete, or you have other questions, please call: (412) 765-1600.



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

IN REPLY PLEASE
REFER TO OUR FILE

DOCUMENT
FOLDER

March 24, 1998

In Re: A-00113657F0001AmA

(See letter dated 01/20/98)

Application of Jenks, Inc. t/a Georgia P. Carroll Moving Company
A Corporation of the Commonwealth of Pennsylvania

For amendment to its common carrier certificate, which grants the right, to transport, by motor vehicle household goods in use, between points in the City of Pittsburgh, Allegheny County: SO AS TO PERMIT the transportation of household goods in use, between points in the counties of Allegheny, Beaver, Butler, Greene, Washington and Westmoreland, and from points in said counties, to points in Pennsylvania, and vice versa.

Hearing Notice

This is to inform you that the Initial Hearing now scheduled to be held on Wednesday, March 25, 1998 at 10:00 a.m. in Pittsburgh, Pennsylvania has been canceled.

Presiding Officer: Administrative Law Judge Larry Gesoff
1103 Pittsburgh State Office Building
300 Liberty Avenue
Pittsburgh, PA 15222
Telephone: (412) 565-3550

130736

Please mark your records accordingly.

pc: Judge Gesoff
Norma Lewis
Steve L. Springer, Scheduling Officer
Beth Plantz
Docket Section
Calendar File

DOCKETED
MAR 25 1998

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PROthon CLERK'S OFFICE
MARCH 24 1998

BTL

COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION

DATE: March 25, 1998

SUBJECT: A-00113657F0001AmA Application of Jenks, Inc. t/a Georgia P. Carroll Moving Company, a Corporation of the Commonwealth of Pennsylvania Modified Procedure

TO: Peter Marzolf
Transportation & Safety

FROM: Steve Springer, Scheduling Officer *SS*
Office of Administrative Law Judge

Since the protest(s) in the above-captioned proceeding has/have been withdrawn, the application is referred to your bureau for review and report to the Commission.

pc: Judge Gesoff
Aggie Brewster, Docket Section
Norma R. Lewis
Beth Plantz
Office File

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APR 7 1998

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93 MAR 26 AM 9:28
PA.U.C.
PROTHONDARY'S OFFICE

APPEARANCE SHEET

ALJ HEARING REPORT

Docket No. A-00113657F0001, Am-A

Case Name Application of Jenks, Inc.
t/a Georgia P. Carroll Moving Company

Location Pittsburgh

Date March 25, 1998

ALJ Gesoff

Reporting Firm _____

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing held YES _____ NO _____

Hearing held YES _____ NO X

Testimony taken 7/1 YES _____ NO _____

Transcript due YES _____ NO _____

Hearing concluded YES _____ NO _____

Further hearing needed YES _____ NO _____

Estimated add'l days _____

RECORD CLOSED YES _____ NO _____

DATE _____

Briefs to be Filed YES _____ NO _____

DATE _____

BENCH DECISION YES _____ NO _____

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 OFFICE OF C.A.L.J.
 98 MAR 26 AM 8:40
 PA PUC

DOCUMENT FOLDER

REMARKS: Restrictive Amendment to result in withdrawal of all protests. When all protests withdrawn please refer for modified procedure.

NAMES, ADDRESSES AND TELEPHONE NUMBERS OF PARTIES OR COUNSEL OF RECORD
 PLEASE PRINT CLEARLY
 INCOMPLETE INFORMATION MAY RESULT IN DELAY OF PROCESS

NAME and TELEPHONE NUMBER	ADDRESS			APPEARING FOR
Telephone No.	City	State	Zip	RECEIVED 98 APR -1 AM 10:33 PROthonotary's OFFICE
Telephone No.	City	State	Zip	
Telephone No.	City	State	Zip	

CHECK THIS BOX IF ADDITIONAL PARTIES
 OR COUNSEL OF RECORD APPEAR ON BACK.

 REPORTER

ORIGINAL

LAW OFFICES

REP

WICK, STREIFF, MEYER, McGRAIL & O'BOYLE, P.C.

HENRY M. WICK, JR.
CHARLES J. STREIFF
CARL F. MEYER
PATRICIA L. McGRAIL
DAVID M. O'BOYLE
VINCENT P. SZEUGO
LUCILLE N. WICK
DOUGLAS P. SPENCE
JOHN M. SMITH
RICHARD T. SCHADLE

1450 TWO CHATHAM CENTER
PITTSBURGH, PA 15219-3427
(412) 765-1600

FACSIMILE
(412) 261-3783
E-MAIL
wsmmo@sgi.net

1714 LINCOLN WAY
WHITE OAK, PA 15131-1716
(412) 664-4433

DUFF OFFICE CENTER, SUITE 203
10 DUFF ROAD
PITTSBURGH, PA 15235-3206
(412) 241-7227

11
62

March 31, 1998

Re: Application of Jenks, Inc., t/d/b/a
Georgia P. Carroll Moving Company
Docket No. A-00113657, F.1, Am-A
Our File 6117.003

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

Dear Mr. McNulty:

By letter dated March 23, 1998, we telecopied to Chief Judge Robert A. Christianson a copy of the signed Restrictive Amendment and Withdrawals of Protests in connection with the above-captioned case. We are enclosing the signed original and two copies of this document.

Please note that the copy of the Withdrawal of Protest signed by Patrick Kissel, Sr. that was forwarded to Chief Judge Christianson was dated March 23, 1998. Mr. Kissel has advised that he has not been able to locate the signed original of that document. Mr. Kissel has signed another Withdrawal of Protest, which is attached as Appendix "C" to the enclosed Restrictive Amendment, and the date on this Withdrawal of Protest is March 30, 1998.

As indicated in our previous correspondence to Judge Christianson, we request that the Commission assign this unopposed application case for handling on a non-hearing basis. If there are any questions concerning this matter, please contact me.

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NORTH CAROLINA OFFICE
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44

WICK, STREIFF, MEYER, McGRAIL & O'BOYLE, P.C.

James J. McNulty, Secretary
March 31, 1998
Page Two

A copy of this letter and a copy of the enclosed Restrictive Amendment and Withdrawal of Protests are being served upon Administrative Law Judge Larry Gesoff and all parties of record.

Very truly yours,

WICK, STREIFF, MEYER,
McGRAIL & O'BOYLE, P.C.



David M. O'Boyle

DOB/pac
Enclosure

cc: Honorable Larry Gesoff, ALJ (w/encl.)
William A. Gray, Esquire (w/encl.)
John A. Pillar, Esquire (w/encl.)
Mr. Patrick A. Kissel, Sr. (w/encl.)
Georgia P. Carroll Moving Company (w/encl.)

140565

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of
JENKS, INC., t/d/b/a
GEORGIA P. CARROLL MOVING COMPANY

Docket No. A-00113657, F.1, Am-A

98 APR -2 PM 9:54
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PROTESTANTS OFFICE

**RESTRICTIVE AMENDMENT AND
WITHDRAWAL OF PROTESTS**

1. Jenks, Inc., t/d/b/a Georgia P. Carroll Moving Company hereby restrictively amends its application in the above captioned case to read as follows:

To transport, as a common carrier by motor vehicle, household goods in use, for the Housing Authority of the City of Pittsburgh, Allegheny County Housing Authority, Negley Corner Limited Partnership, Housing Opportunities Unlimited, LLM-7 Cleaning Company, Inc. and Bedford Dwelling Resident Council, between points in the county of Allegheny, and from points in said county to points in the counties of Beaver, Butler, Greene, Washington, and Westmoreland, and vice versa;

Subject to the following conditions:

Provided that no right, power or privilege is granted to provide service between points in the City of Pittsburgh, Allegheny County.

2. Based upon the foregoing Restrictive Amendment, and conditioned upon the acceptance of the Restrictive Amendment by the Commission and any grant of authority being consistent with the Restrictive Amendment, all of the Protestants in this proceeding are hereby withdrawing their protests and attached hereto as Appendices are the Withdrawals of Protests on behalf of the Protestants.

Counsel for Protestants and Protestant Patrick Kissel, Sr., who is not represented by counsel, will remain a party of record for the purpose of receiving copies of all notices and

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APR 06 1998

DOCUMENT
FOLDER

orders issued in this proceeding. The names of the representatives of the parties who shall remain of record, along with the Appendix reference to their Withdrawal of Protest, are set forth below:

William A. Gray, Esquire
Vuono & Gray LLC
2310 Grant Building
Pittsburgh, PA 15219

John A. Pillar, Esquire
Pillar Mulroy & Ferber, P.C.
1106 Frick Building
Pittsburgh, PA 15219

Patrick A. Kissel, Sr.
550 Pine Creek Road
Wexford, PA 15090

APPENDIX "A"

McKean & Burt, Inc. t/d/b/a
All Ways Moving & Storage
Anderson Transfer, Inc.
Weleski Transfer, Inc.
O.H. Nicholas Transfer & Storage Co.
Vesely Bros. Moving & Storage, Inc.
Century III Moving Systems, Inc. t/b/d/a
Clairton Transfer Company and
Pleasant Hills Van & Storage
South Hills Movers, Inc.
Leelease, Inc.
B.H. Stumpf Co., Inc.
Fife Moving & Storage Co.
Best Moving & Storage Co.
Forest Hills Transfer and Storage, Inc.

APPENDIX "B"

Debo Moving and Storage, Inc.
The Snyder Brothers Moving, Inc., t/a
George Transportation Company

APPENDIX "C"

Patrick Kissel, Sr.

Dated at Pittsburgh, Pennsylvania this 20th day of March, 1998.

Jenks, Inc., t/b/d/a
Georgia P. Carroll Moving Company

By: David M. O'Boyle
David M. O'Boyle, Esquire
1450 Two Chatham Center
Pittsburgh, PA 15219
(412) 765-1600
Counsel for Applicant

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of
JENKS, INC., t/d/b/a
GEORGIA P. CARROLL MOVING COMPANY

Docket No. A-00113657, F.1, Am-A

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90 APR -2 01 9:54

APENDIX "A"

WITHDRAWAL OF PROTESTS

Protestants McKean & Burt, Inc., t/d/b/a All Ways Moving & Storage, Anderson Transfer, Inc., Weleski Transfer, Inc., O.H. Nicholas Transfer & Storage Co., Vesely Bros. Moving & Storage, Inc., Century III Moving Systems, Inc., t/b/d/a Clairton Transfer Company and Pleasant Hills Van & Storage, South Hills Movers, Inc., Leelease, Inc., B.H. Stumpf Co., Inc., Fife Moving & Storage Co., Best Moving & Storage Co., and Forest Hills Transfer and Storage, Inc., by and through their counsel, William A. Gray, Esq., hereby withdraw their protests to the above-captioned application based upon the Restrictive Amendment to which this Withdrawal of Protests is attached.

Dated: 3/23/98

By: 
William A. Gray, Esquire
Vuono & Gray LLC
2310 Grant Building
Pittsburgh, PA 15219

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

140567

Application of
JENKS, INC., t/d/b/a
GEORGIA P. CARROLL MOVING COMPANY

Docket No. A-00113657, F.1, Am-A

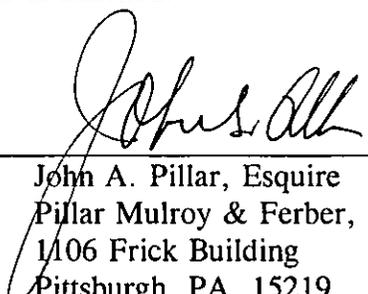
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PROTHONOTARY'S OFFICE
98 APR - 2 11 9:54

APENDIX "B"

WITHDRAWAL OF PROTESTS

Debo Moving and Storage, Inc., and The Snyder Brothers Moving, Inc., t/a George Transportation Company, by and through their counsel, John A. Pillar, Esq., hereby withdraw their protests to the above-captioned application based upon the Restrictive Amendment to which this Withdrawal of Protests is attached.

Dated: 3-23-98

By: 
John A. Pillar, Esquire
Pillar Mulroy & Ferber, P.C.
1106 Frick Building
Pittsburgh, PA 15219

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of
JENKS, INC., v/d/b/a
GEORGIA P. CARROLL MOVING COMPANY

Docket No. A-00113657, F.1, Am-A

98 APR -2 11 9:55
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PROTESTANT'S OFFICE

APPENDIX "C"

WITHDRAWAL OF PROTEST

Protestant Patrick Kissei, Sr. hereby withdraws his protest to the above-captioned application based upon the Restrictive Amendment to which this Withdrawal of Protest is attached.

Dated: 3-30-98

By: Patrick A. Kessel Sr.
Patrick Kissei, Sr.
550 Pine Creek Road
Wexford, PA 15090



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

IN REPLY PLEASE
 REFER TO OUR FILE

April 20, 1998

DAVID M O'BOYLE
 ATTORNEY AT LAW
 1450 TWO CHATTAM CENTER
 PITTSBURGH PA 15219-3427

In re: A-00113657, F. 1, Am-A - Application of Jenks, Inc., t/a
 Georgia P. Carroll Moving Company.

Dear Mr. O'Boyle:

The above referenced application has been assigned for review without oral hearing. In order to reach a determination on the application, you are being required to file verified statements in accordance with 52 Pa. Code Section §3.381(e)(1). You will be required to file:

- A. VERIFIED STATEMENT OF APPLICANT
- B. VERIFIED STATEMENT(S) IN SUPPORT OF THE APPLICATION.

The verified statements should be in paragraph form. Each heading contained in the attached minimum outline should be a separate section or paragraph.

You should be aware of the fact that the verified statements will be reviewed based on the Commission's decision in the Application of Blue Bird Coach Lines, Inc., (A-00088807, F. 2, Am-K) 72 Pa. P.U.C. 262 (1990), which indicates: (1) the supporting witnesses must give evidence which is probative and relevant to the application proceeding; (2) the supporting witnesses must identify Pennsylvania origin and destination points between which they require transportation and those points must correspond with the scope of the operating territory specified in the application, including requests for vice versa authority; and (3) the number of witnesses which will represent a cross section of the public on the issue of need will vary with the breadth of the intended territory and commodity description.

You are being granted an initial thirty (30) days to file verified statements. They will be due on or before May 20, 1998.

If additional time is required, it may be requested by telephone but must be followed in writing with the reasons for the extension stated. Questions about the application should be directed to Gale E. Travitz at 717-787-5513.

Very truly yours,

Gale E. Travitz
 Compliance Office
 Bureau of Transportation & Safety

DOCKETED
 APPLICATION DOCKET
 APR 20 1998
 ENTRY No. *[Signature]*

DOCUMENT
 FOLDER

LAW OFFICES

WICK, STREIFF, MEYER, O'BOYLE & SZELIGO, P.C.

HENRY M. WICK, JR.
CHARLES J. STREIFF
CARL F. MEYER
DAVID M. O'BOYLE
VINCENT P. SZELIGO
LUCILLE N. WICK
DOUGLAS P. SPENCE
JOHN M. SMITH
RICHARD T. SCHADLE

1450 TWO CHATHAM CENTER
PITTSBURGH, PA 15219-3427

(412) 765-1600

FACSIMILE
(412) 261-3783

E-MAIL
wsmos@sgi.net

DUFF OFFICE CENTER, SUITE 203
10 DUFF ROAD
PITTSBURGH, PA 15235-3206
(412) 241-7227

May 18, 1998

Re: Jenks, Inc., t/d/b/a Georgia P. Carroll Moving Company
Docket No. A-00113657, F.1, Am-A
Our File 6117.003

Ms. Gale E. Travitz
Compliance Unit
Pennsylvania Public Utility Commission
Bureau of Transportation & Safety
P.O. Box 3265
Harrisburg, PA 17105-3265

Dear Ms. Travitz:

We represent Jenks, Inc., t/d/b/a Georgia P. Carroll Moving Company which is the Applicant in the above captioned case. By Notice dated April 20, 1998, the Commission granted Applicant an initial 30 days to file Verified Statements in support of this unopposed application for household goods authority. We request an extension of 30 days to submit evidence in support of the application. The reason for the request is that there are a number of public witnesses supporting the application, and additional time is necessary for the witnesses to review their Statements and finalize them for submission to the Commission.

Unless otherwise notified, I shall assume that this extension request has been granted and that Applicant's Verified Statements shall be due on or before June 19, 1998.

Please acknowledge receipt of this letter by stamping the enclosed duplicate copy and returning it to the undersigned in the self-addressed, stamped envelope which is provided for that purpose. Thank you for your consideration and cooperation.

DOCKETED
APPLICATION DOCKET
MAY 21 1998
ENTRY NO.

Very truly yours,

WICK, STREIFF, MEYER,
O'BOYLE & SZELIGO, P.C.

David M. O'Boyle

David M. O'Boyle

DOCUMENT
FOLDER

DOB/pam
Enclosure

cc: Georgia P. Carroll Moving Company

COMMUNICATIONS



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

IN REPLY PLEASE
REFER TO OUR FILE

May 26, 1998

DAVID M O'BOYLE
ATTORNEY AT LAW
1450 TWO CHATHAM CENTER
PITTSBURGH PA 15219-3427

In re: A-00113657, F. 1, Am-A - Application of Jenks, Inc.,
t/d/b/a Georgia P. Carroll Moving Company.

Dear Mr. O'Boyle:

In accordance with your request of May 18, 1998 for an extension of time to file verified statements, we are granting an additional thirty (30) days for filing of statements.

Please be advised that verified statements are now due on June 19, 1998. If said statements are not filed with this office by that date we shall assume that you do not desire to pursue this matter and shall recommend to the Commission that the application be dismissed for lack of prosecution.

If you have any questions, please do not hesitate to contact Gale E. Travitz at (717) 787-5513.

Very truly yours,

By Gale E. Travitz
For Peter S. Marzolf, Supervisor
Compliance Office
Bureau of Transportation

GET:rs

DOCKETED
APPLICATION DOCKET
MAY 26 1998
ENTRY No. 8



LAW OFFICES

WICK, STREIFF, MEYER, O'BOYLE & SZELIGO, P.C.

HENRY M. WICK, JR.
CHARLES J. STREIFF
CARL F. MEYER
DAVID M. O'BOYLE
VINCENT P. SZELIGO
LUCILLE N. WICK
JOHN M. SMITH
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DUFF OFFICE CENTER, SUITE 203
10 DUFF ROAD
PITTSBURGH, PA 15235-3206
(412) 244-7227

1-2-99
39

June 15, 1998

Re: Application of Jenks, Inc.,
t/d/b/a Georgia P. Carroll Moving Company
Docket No. A-00113657, F.1, Am-A
Our File 6117.003

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

Dear Mr. McNulty:

Please find enclosed for filing with the Commission the signed original and one (1) copy of Applicant's Verified Statements on Behalf of Jenks, Inc., t/d/b/a Georgia P. Carroll Moving Company in connection with the above captioned case. If you have any questions concerning this matter, please contact the undersigned.

Please acknowledge receipt of the enclosed on the duplicate copy of this letter of transmittal, and return it to the undersigned in the enclosed, self-addressed, stamped envelope which is provided for that purpose.

Very truly yours,

WICK, STREIFF, MEYER,
O'BOYLE & SZELIGO, P.C.



David M. O'Boyle

DOB/pam
Enclosures

cc: Georgia P. Carroll Moving Company (w/encls.)

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SECRETARY'S BUREAU
98 JUN 17 AM 8:31

152943

Before the

PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A-00113657, F.1, Am-A

APPLICATION OF JENKS, INC. t/d/b/a
GEORGIA P. CARROLL MOVING COMPANY

RECEIVED
SECRETARY'S BUREAU
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APPLICANT'S VERIFIED STATEMENTS

I. STATEMENT OF CASE

By application published in the Pennsylvania Bulletin on November 15, 1997, Jenks, Inc. t/d/b/a Georgia P. Carroll Moving Company ("Applicant" or "Carroll") initially sought authority to operate as a common carrier by motor vehicle to provide the following service:

Household goods in use, between points in the counties of Allegheny, Beaver, Butler, Greene, Washington and Westmoreland, and from points in said counties, to points in Pennsylvania, and vice versa.

Protests in opposition to the application were filed by 15 carriers. Applicant submitted a Restrictive Amendment, dated March 20, 1998, which modified the scope of the application to read as follows:

To transport, as a common carrier by motor vehicle, household goods in use, for the Housing Authority of the City of Pittsburgh, Allegheny County Housing Authority, Negley Corner Limited Partnership, Housing Opportunities Unlimited, LLM-7 Cleaning Company, Inc. and Bedford Dwelling Resident Council, between points in the county of Allegheny, and from points in said county to points in the counties of Beaver, Butler, Greene, Washington and Westmoreland, and vice versa;

Subject to the following conditions:

Provided that no right, power or privilege is granted to provide service between points in the City of Pittsburgh, Allegheny County.

Based upon this Restrictive Amendment and conditioned upon the acceptance of the Restrictive Amendment by the Commission, all of the Protestants withdrew their opposition to the application. This application is now unopposed.

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APPLICATION DOCKET
AUG 13 1998
ENTRY No.

Applicant is hereby further amending the scope of the application by eliminating from the application the following two supporting shippers: Negley Corner Limited Partnership and Bedford Dwelling Resident Council. Both of these organizations have household goods movements that are within the City of Pittsburgh. Applicant presently holds authority to serve these organizations in that testimony, and it is not necessary to request any additional authority for these organizations.

Applicant would like to bring to the Commission's attention that the Verified Statement of Edward R. Jagnandan on the behalf of Allegheny County Housing Authority was signed by Allegheny County Housing Authority's General Counsel, John W. Joyce, Esquire, on behalf of Mr. Jagnandan. We understand that Mr. Jagnandan was not available to sign the Statement and Mr. Joyce signed the Statement for Mr. Jagnandan.

Applicant hereby submits its Verified Statements in support of this application.

II. APPLICANT'S VERIFIED STATEMENTS

VERIFIED STATEMENT OF CECELIA A. JENKINS ON BEHALF OF APPLICANT

1. Legal Name and Domicile of Applicant.

The name of Applicant is Jenks, Inc. which is a Pennsylvania Corporation conducting business in Pennsylvania under the assumed name of Georgia P. Carroll Moving Company. Applicant's principal place of business is located at 42 Ridgecrest Drive, Pittsburgh, PA 15235-4548.

2. Qualifications of Witness.

My name is Cecelia A. Jenkins, and my business address is 42 Ridgecrest Drive, Pittsburgh, PA 15235-4548. I am the President and majority stockholder of Applicant, and I oversee Applicant's household goods operations. I am actively involved in all aspects of Applicant's business, and I am well acquainted with the manor in which it presently conducts business and also with Applicant's proposal to expand its household goods operations. I am authorized on behalf of Applicant to submit this Verified Statement in support of its application at Docket No. A-00113657, F.1, Am-A.

3. Applicant's Affiliation With Other Carriers.

Applicant is not affiliated with any other carrier which holds operating authority from the Pennsylvania Public Utility Commission ("Commission").

4. Authority Sought By This Application.

By this application, as amended, Applicant is requesting authority to provide service for four (4) named shippers in transporting household goods between points in Allegheny County, and from points in Allegheny County to points in five nearby counties in Southwestern Pennsylvania, and vice versa. The scope of the requested authority, as amended, is as follows:

To transport, as a common carrier by motor vehicle, household goods in use, for the Housing Authority of the City of Pittsburgh, Allegheny County Housing Authority, Housing Opportunities Unlimited, and LLM-7 Cleaning Company, Inc., between points in the county of Allegheny, and from points in said county to points in the counties of Beaver, Butler, Greene, Washington and Westmoreland, and vice versa;

Subject to the following conditions:

Provided that no right, power or privilege is granted to provide service between points in the City of Pittsburgh, Allegheny County.

5. General Scope of Currently Authorized Operations.

Applicant was granted operating authority by Order entered March 20, 1997.

This grant authorizes Applicant to transport household goods in use between points in the City of Pittsburgh. It also authorizes household goods service for one shipper from points in the City of Pittsburgh to other points in Allegheny County. Applicant is presently conducting operations pursuant to this grant of authority on a regular, almost daily basis.

6. Duplicating Authority Which Will Result from Grant of Application.

Approval of this application will not result in any grant of duplicating operating authority. Applicant intentionally included in the Restrictive Amendment a provision which excludes service between points in the City of Pittsburgh. This restriction was intended to eliminate any issue regarding whether approval of the application would result in a grant of any duplicating operating rights.

7. Permanent Terminal Facilities and Communications Network.

Applicant is a small family owned and operated company and our only facility is a business office which is located in my residence. Applicant has been operating for only one year and our business has not yet grown to the extent that a warehouse facility is needed.

One of the advantages of operating a small company is that we are able to maintain a good communication network to assist in providing prompt, expeditious service on short notice and also to coordinate operations to maximize efficient use of our equipment. My husband, Earl Jenkins, supervises our crew of workers who perform the physical labor in picking up and delivering household goods. He has access to a cellular phone and he can be reached on a moment's notice. We also have an answering system which is activated during off-business hours when no one is available as well as during business hours when the phone cannot be answered in person.

Applicant also communicates by means of advertising. We have purchased various items with our company's name and phone number on them, including coffee mugs and ink pens. These items are used to promote our business. We also advertise our

household goods operations in the Greater Pittsburgh Black Directory which is produced by Renaissance Publication for the Pittsburgh area. In addition, Applicant has placed an advertisement in the 1997-98 Greater Pittsburgh Black Business Directory & Resource Guide. This directory contains the largest listing of African American Entrepreneurs in the Greater Pittsburgh Area. Advertisements are periodically placed in a local newspaper called the Pittsburgh Renaissance News.

8. Equipment.

Applicant owns and operates a 1993 Nissan 22 foot straight truck. This vehicle is a closed in van or "box" which protects cargo from the weather while it is being transported. We also own and operate a 1995 Chevrolet Suburban. This vehicle is used to transport workers to and from the loading and unloading points. In addition, the vehicle can be used to haul small items or fragile items of furniture in relocating a customer. As Applicant's business continues to grow, Applicant is optimistic that it will be able to purchase additional equipment within the next 1 or 2 years in order to continue our plans to expand the size and scope of our household goods operations.

9. Safety Program.

Applicant has established a safety and maintenance program to comply with the Commission's safety regulations and those of the Pennsylvania Department of Transportation. For instance, we have very stringent driver qualifications in order to employ drivers capable of providing safe and efficient service to our customers. Presently, only my husband and my son are authorized to drive our moving van. Any other drivers will be subject to safety background checks of their driving records. Also, drivers will have to complete training to qualify to operate the moving van. As part of our safety program, the moving van is inspected for potential safety hazards before being dispatched. The van is also serviced and maintained by our staff on at least a regular, monthly basis. We contract with a certified mechanic for the vehicle to be inspected to comply with the regulations of PennDOT.

After Applicant was issued its initial grant of authority, a PUC Enforcement Officer conducted a safety review of our operations. I met with him and, to the best of my knowledge, Applicant's operations are in compliance with all applicable safety regulations.

10. Service Currently Provided to Supporting Witnesses.

During the first year of operations, Applicant has provided service for several of the supporting witnesses in transporting household goods between points in the City of Pittsburgh. For instance, the Housing Authority of the City of Pittsburgh has used Applicant's services numerous times in relocating residents whose dwellings had been damaged by fire or which had health code violations and were not suitable to live in. Applicant has provided service for the Housing Authority on short notice in order to accommodate persons who are confronted with emergency situations. Applicant has also handled a considerable number of moves for the supporting shipper Housing Opportunities Unlimited in relocating residents from a housing development known as Aliquippa Terrace to points within the City of Pittsburgh.

Applicant has considerable first hand experience in providing household goods service in the types of situations that the supporting witnesses need service.

11. Type of Service Offered.

Applicant intends to offer the same type of household goods moving service that it is presently providing within its authorized service territory. This includes service 24 hours a day, 7 days a week. Equipment will be dispatched upon short notice to accommodate individuals or families whose residences have been damaged by fire or which are otherwise are uninhabitable. Upon request, we will package or box the personal items of a customer to protect them in transit. Once the household goods are loaded on the van, our crew will proceed immediately to deliver the goods to destination without any delays. Service will be provided in a courteous and efficient manner, and our workers are instructed to make reasonable accommodations to satisfy the requests of customers. I am confident that Applicant will be able to provide the same high quality service for the supporting witnesses in the application territory as it is now providing in its authorized service area.

12. Financial Data.

Attached to my Statement as Exhibit "A" is a Balance Sheet as of December 31, 1997. This Balance Sheet indicates that Applicant is financially sound and capable of expanding its operations to provide the additional service proposed by this application.

Applicant has total assets in the amount of \$58,484 which exceeds both its current and long term liabilities. Applicant's equity or net worth amounts to \$16,104.

Attached to my Statement is Exhibit "B" is an Income Statement for the period ending December 31, 1997. This Statement indicates that Applicant had gross operating revenues of \$102,848 which yielded a modest profit for the year. By extending our household goods operations in the Southwestern Pennsylvania area for the supporting witnesses, this will allow us to generate more revenue and realize a greater return on our investment. Approval of this application will enable us to increase the efficiency of our operation, which in turn will help increase our profit margin.

13. Other Information Deemed Pertinent.

Georgia P. Carroll Moving Company is a fully certified woman owned business enterprise and a certified minority business enterprise. Attached as Exhibit "C" are copies of the *Determination and Certifications issued to Applicant with respect to being both a woman owned business enterprise and minority business enterprise.* There are, at most, only a few minority owned businesses or woman owned businesses in Southwestern Pennsylvania and I am not aware of any that are both minority owned business and a woman owned business. This is significant since the Governor of Pennsylvania has an official policy which advocates creating more business opportunities for minority and woman owned businesses. Also, there are governmental agencies, such as the Minority, Woman and Disadvantaged Business Enterprise of the County of Allegheny, which are created for purposes of promoting the creation and expansion of minority and woman businesses. Approval of this application will be completely consistent with the highly acclaimed goal of encouraging and fostering the success of such businesses. By granting the requested authority, Applicant will be able to extend the geographic scope of its operations so that it can serve more individuals, including residents of housing projects who either want to be relocated within Allegheny County or to points in nearby counties.

Based upon my research and personal knowledge, there are very few PUC certificated household goods movers which actively solicit business in housing projects and, as a result, there is very little competition for this business. This is not in the interest of the

residents of the housing projects or in the best interest of the governmental agencies which are responsible for the relocation operations.

If this application is approved, Applicant does not anticipate that it will be necessary to make any additional investment in equipment to accommodate the needs of the supporting witnesses. We expect to make greater utilization of our moving van which should significantly help to increase our company's net profit. However, if we are unable to service the needs of the supporting witnesses, we are willing to purchase or lease additional equipment, if necessary. Approval of this application will benefit not only the supporting witnesses, but also the members of the public who will benefit from having available Applicant's service to transport their household goods. Our company is in the business of serving the public, regardless of their social or economic status. I firmly believe that, if Applicant is given the opportunity to provide service as requested, Applicant will be a competitive factor to deal with and this will benefit the public.

For all of the foregoing reasons, Jenks, Inc. t/d/b/a Georgia P. Carroll Moving Company respectfully requests that the Commission grant this entire application as amended so that we may expand our household goods moving service.

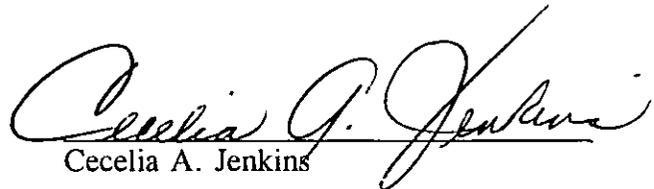

Cecelia A. Jenkins

Exhibit "A"

JENKS INC.
STATEMENT OF FINANCIAL POSITION (Balance Sheet)
as of December 31, 1997

ASSETS

Current Assets

Cash		\$	3,901
Accounts Receivable			14,495
Notes Receivable			
Prepaid Insurance			458

Total Current Assets			18,854
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Tangible Assets

Land			
Motor Vehicle Equipment	\$	13,700	
Less: Accumulated Depreciation		4,820	8,880
Buildings and Structures		25,000	
Less: Accumulated Depreciation		0	25,000
Intangible Asset			5,750

TOTAL ASSETS			\$ 58,484
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LIABILITIES

Current Liabilities

Accounts Payable		\$	5,269
Payroll Tax Payable			7,589
Notes Payable			3,305

Total Current Liabilities			16,163
---------------------------	--	--	--------

Long Term Liabilities

Loans from Shareholders			26,217
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TOTAL LIABILITIES			42,380
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OWNER'S EQUITY

Capital Stock			10,000
Additional Paid-in Capital			
Retained Earnings	\$	6,104	
Less Treasury Stock		0	6,104

TOTAL OWNER'S EQUITY(Net Worth)			16,104
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TOTAL LIABILITIES & OWNER'S EQUITY			\$ 58,484
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Exhibit "B"

JENKS INC
STATEMENT OF FINANCIAL CONDITION
INCOME STATEMENT

For the 12-Month Period Ending December 31, 1997

REVENUES and GAINS

Operating Revenue	\$ 102,848
Net Revenue from non-carrier operation	
Dividend and Interest Revenue	
Other non-operating revenue	
Gains	
Total Revenue and Gains	102,848

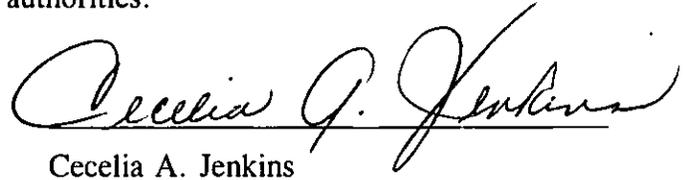
EXPENSES

Repairs & Maintenance	7,576
Taxes & licenses	2,264
Interest Expense	3,232
Depreciation Expense	2,537
Employee Salary	37,724
Legal & Accounting Expense	9,555
Dues & Subscriptions	896
Equipment Maintenance & Garage Expenses	1,066
Insurance Expense	7,685
Office Expense	2,332
Postage Expense	706
Materials & Supplies Expenses	3,710
Telephone Expense	4,406
Fuel Expense	5,109
Uniform Expense	1,156
Utilities Expenses	2,482
Parking & Tolls	1,093
Equipment Rental	622
Scholarship Expense	625
Travel Expense	400
Misc. Expenses	1,986
Total Operating Expenses	97,162
Net Income Before Taxes	5,686
Provision for Income Taxes	0
NET INCOME (LOSS)	\$ 5,686

VERIFICATION

I verify that the statements made in the foregoing Verified Statement of Cecelia A. Jenkins on behalf of Applicant are true and correct to the best of my knowledge, information and belief. I understand that all statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Dated: June 12, 1998


Cecelia A. Jenkins

VERIFIED STATEMENT OF BETSY PUGH

1. Applicant's Name and the Docket No. of the Application Supported.

Applicant's name is Jenks, Inc. t/d/b/a Georgia P. Carroll Moving Company ("Carroll") and this Verified Statement is submitted in support of Carroll's household goods application at Docket No. A-00113657, F.1, Am-A.

2. Legal Name and Domicile of Supporting Party.

This Verified Statement is being submitted on behalf of Betsy Pugh, who is an individual who lives and works in Allegheny County.

3. Identity and Qualifications of Witness.

My name is Betsy Pugh, and my business address is 1835 Center Avenue, Room 201, Pittsburgh, PA 15219. I hold the position of Division Manager with The Central Relocation Agency ("Agency") of the Housing Authority of the City of Pittsburgh ("Authority"). I was originally hired by the Authority on June 5, 1992, when the Relocation Agency was re-assigned from the jurisdiction of the Urban Redevelopment Authority to the HACP. I have worked with the Central Relocation Agency and its predecessors for almost 26 years. As Division Manager of the Central Relocation Agency, I am responsible for overseeing the operation of moving individuals and their household goods from residences from within the city of Pittsburgh to other locations. The Agency is responsible for contacting household goods movers to provide service for residents of the City of Pittsburgh who must vacate their residences for health or safety reasons. I am submitting this Verified Statement in support of the Carroll application so that Carroll may provide service for The Central Relocation Agency between points in Allegheny County and from points in Allegheny County to the surrounding counties of Beaver, Butler, Greene, Washington and Westmoreland, and vice versa.

4. Description of Supporting Witness.

As previously discussed, I am the Division Manager for The Central Relocation Agency. The Central Relocation Agency is responsible for making arrangements with household goods movers to transport the residents and all of their personal belongings from their residences to other locations. The locations where the household goods are moved to could be the residence of friends or relatives, public housing communities, or even in some

situations storage facilities where the household goods would be kept until the families are ready either to return to their dwellings or to move to permanent housing.

The Central Relocation Agency contacts household goods movers to provide service. The budget is limited and the household goods movers that I contact must agree to The Central Relocation Agency's modest fee schedule. Because of the nature of the emergencies that are experienced on a regular basis, it is essential that I be able to have available on short notice the service of household goods movers to accommodate the needs of the Agency's clients. I am supporting the application of Carroll so that Carroll may expand the scope of its operations so that its high quality service is available not only between points in Pittsburgh, but also to and from points in Allegheny County and the surrounding counties.

5. Volume and Frequency of Intended Use.

In my job, I offer clients the option of receiving a lump sum amount to move their own belongings or they can elect to have the Authority pay a mover to transport their belongings. In March, 1998, there was a total of 24 clients who requested this service, and I arranged with a household goods mover to provide service for 9 of them. In February, 1998, there were 26 clients who needed to relocate their residences, and I provided a mover for 11 of those clients. In January, 1998, there were 30 moves and I called a motor carrier to handle 8 of those moves. Each month I receive about 40 to 50 referrals, but often times a household does not need to move out of a residence the same month that the referral is received.

I would estimate that The Central Relocation Agency has on average 9 to 10 moves per month that require the services of a motor carrier. However, there could be twice that number in any given month because a number of households may decide, for whatever reason, that it is not worth their time and effort to move themselves.

6. Representative Origins and Destinations.

The Central Relocation Agency's procedures allow for City of Pittsburgh residents who have been forced to evacuate their residences to be transported to another location on a temporary basis. The Central Relocation Agency will also pay for one additional move for residents to be transported either back to their original residences which were vacated or to other permanent residences. The origin of these household goods moves could be from any point located within the City of Pittsburgh, such as the North Side, Hill District, South Side

and any of the many public housing communities within the city limits. The policy of the The Central Relocation Agency is that it will pay for any move provided that the destination is within a 50 mile radius of the limits of the City of Pittsburgh. Attached to my statement as Appendix "A" is a representative list of various points throughout Allegheny County where the The Central Relocation Agency has paid a motor carrier to move the household goods of Pittsburgh residents on a temporary and permanent basis.

Although the majority of the moves are to points within Allegheny County, there are occasions when there is a need for service to points in surrounding counties. For instance, there have been shipments to such points as Saxonburg, Butler County, Aliquippa, Beaver County, Washington, Washington County, and Waynesburg, Greene County.

Since the The Central Relocation Agency offers to move the person from the temporary residence to a permanent location, every destination for the temporary move is a potential origin for a permanent move back into the City of Pittsburgh or to points in Allegheny County.

In addition, the The Central Relocation Agency receives donations of household items which must be picked up and delivered either to The Central Relocation Agency's shelter, Allegheny House, on the North Side of Pittsburgh, or directly to a client's residence. For instance, there have been shipments from Plum Borough and Cannonsburg to The Allegheny House. Although these are not frequent occurrences, it is important to the ongoing operation of The Central Relocation Agency and to its clients that donations of household goods be picked up and delivered whenever and wherever they become available.

7. Type of Service Required.

The Central Relocation Agency has very unique service requirements that are not common in the household goods industry. For instance, when there is a fire, it is necessary to make arrangements with a household goods carrier to move the remaining furnishings of a resident shortly thereafter and, in some instances, the same day that the fire occurs. Likewise, when a house or an apartment building is condemned for safety or health code violations, the resident must leave immediately, and the mover must be able to dispatch equipment as soon as possible after we call to provide assistance. This requires that the mover understand the

needs of the Agency's clients and have a very good working relationship with The Central Relocation Agency.

The requirements pose unique problems for both myself and the movers. For instance, in some situations, the mover must haul furniture which has been damaged by smoke and which can leave an odor in its van. Also, the mover's workers must be willing to load furniture from homes which have infestation problems. Once the move is completed, the mover may have to fumigate its equipment to eliminate odors or residue from the goods that are hauled. Because of these unique problems, we have found that many movers are not interested in doing business with the Agency.

The carrier must also agree to the fee schedule that is set by the The Central Relocation Agency's budget. The fee schedule is based upon the number of rooms which are involved in the move. However, because of the Agency's limited funding, the fee schedule is substantially below the rates which are charged by many movers located in Allegheny County. These rates have remained the same since 1983. This is another reason why The Central Relocation Agency has difficulty in developing a working relationship with other reliable moving companies.

8. Similar Applications Supported.

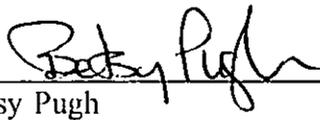
I have not supported any other motor carrier for operating authority to haul household goods for the clients of The Central Relocation Agency.

9. Other Relevant Information.

I have been very satisfied with the quality of the service that Carroll has provided in transporting the furnishings of the Agency's clients between points in Pittsburgh. Since Carroll acquired its operating authority, Carroll has been very responsive in working with me to provide equipment on short notice on an as needed basis. I am very interested in being able to expand its use of Carroll's service to provide service in Allegheny County and in all of the other counties involved in this application which are within 50 miles of Pittsburgh. I have developed very good communications with Carroll, and we have developed a system so that, in most instances, I can contact Carroll at any time of the day or night when I am confronted with an emergency. Carroll also works with me in coordinating the schedule of its

equipment to accommodate hauling donations when they are available. Carroll's spirit of cooperation is invaluable in carrying out important relocation functions.

There is only one other household goods mover that works with me on a regular basis. I do not want to have to rely upon any one carrier to have equipment available to handle moves that are outside of the scope of Carroll's authorized territory. I believe that it would be beneficial to have Carroll extend the scope of its operations to provide a more complete and satisfactory service. I respectfully request that the Commission act favorably upon this application and grant additional operating authority to Carroll to meet the needs of the residents of the City of Pittsburgh for a household goods mover.



Betsy Pugh

APPENDIX "A"

LIST OF DESTINATIONS IN ALLEGHENY COUNTY

West Mifflin
Wilkinsburg
Wexford
McKees Rocks
Ross Township
Coraopolis
Homestead
Rankin
Monroeville

VERIFICATION

The undersigned deposes and says that she is authorized to and does make this Verification and that the facts set forth in the foregoing Verified Statement of Betsy Pugh are true and correct to the best of her knowledge, information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Dated: 5/29/98



Betsy Pugh

VERIFIED STATEMENT OF LESLIE MACKLIN

ON BEHALF OF

LLM-7 CLEANING COMPANY, INC.

1. Applicant's Name and the Docket No. Of the Application Supported.

Applicant's name is Jenks, Inc. t/d/b/a Georgia P. Carroll Moving Company ("Carroll") and this Verified Statement is submitted in support of Carroll's household goods application at Docket No. A-00113657, F.1, Am-A.

2. Legal Name and Domicile of Supporting Party.

This Verified Statement is being submitted on behalf of LLM-7 Cleaning Company, Inc. which has its principal place of business and administrative offices located at 130 Wabash St., Pittsburgh, PA 15220.

3. Identity and Qualification of Witness.

My name is Leslie Macklin, residing at 136 Wabash Street, Pittsburgh, PA 15220. I am the President of LLM-7 Cleaning Company, Inc. since its incorporation in 1994. I am responsible for the day-to-day administrative duties of the corporation, including hiring and purchasing of materials and services for the corporation. I am authorized on behalf of LLM-7 Cleaning Company, Inc. to submit this Verified Statement in support of the Carroll application so that Carroll may provide services to my company between points in Allegheny County and from points in Allegheny County to points in the surrounding counties of Beaver, Butler, Greene, Washington and Westmoreland, and vice versa.

4. General Description of Supporting Party.

LLM-7 Cleaning Company, Inc. is a small family owned company providing residential and office cleaning and maintenance in the Pittsburgh, Allegheny county area. From time to time our client's require the services of a mover, to move and store their household goods within Allegheny and surrounding counties. At the present time we cannot provide these services because we are unable to find a mover who can react at a moment notice at a reasonable price. LLM-7 is supportive of the Carroll application because of their reasonable rates and flexibility.

5. Volume and Frequency of Intended Use.

We are not in a position to estimate the number of moves, because we have not been actively seeking this type of business, because of our inability until now, to find a carrier who could accommodate our needs. However, we estimate that if the Carroll application is approved we could use their services several times per month.

6. Representative Origins and Destinations.

LLM-7 Cleaning Company, Inc. provides services to clients in Allegheny and sometimes in the surrounding counties. We have clients in Crafton, Greentree, McKees Rocks, North Hills and West View. The origins of our household goods moves would be mainly in Allegheny County, with destinations in Allegheny and surrounding counties.

7. Type of Service Required.

LLM-7 Cleaning Company, Inc. provides the type of services that is common in the household goods industry, in that we move goods from one location to another, however, sometimes the move is due to fire or other forced evacuation. Most of our clients are small single family homes or small one-five persons offices who requires immediate attention. We support Carroll application because we believe that they can respond to our client's demands.

8. Similar Application Supported.

I am not aware of any other carrier that LLM-7 Cleaning Company, Inc. has supported within the last four years for intrastate operating authority to haul the household goods of our clients.

9. Other Relevant Information.

LLM-7 Cleaning Company is very satisfied and excited with the level of services that Carroll can provide to our existing clients and other potential clients. We believe that the flexibility that Carroll will bring to our clientele should be considered by the Commission in granting their application for expanded authority.

LLM-7 CLEANING COMPANY, INC.

By Leslie F. Macklin
Leslie Macklin - President

VERIFICATION

The Undersigned deposes and says that she is authorized to and does make this Verification and that the facts set forth in the foregoing Verified Statement of Leslie Macklin on behalf of LLM-7 Cleaning Company, Inc. are true and correct to the best of her knowledge, information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Dated:

May 15, 1998



Leslie Macklin

VERIFIED STATEMENT OF EDWARD R. JAGNANDAN

ON BEHALF OF ALLEGHENY COUNTY HOUSING AUTHORITY

1. Applicant's Name and Docket No. of the Application Supported.

The name of the applicant is Jenks, Inc. t/d/b/a Georgia P. Carroll Moving Company, and the Docket No. of the application which this Verified Statement supports is A-0013657, F.1, Am-A.

2. Legal Name and Domicile of Supporting Party.

The name of the supporting party submitting this Statement is Allegheny County Housing Authority which is a municipal authority with its business headquarters located at 341 Fourth Avenue, The Fidelity Building, Pittsburgh, PA 15222.

3. Name and Qualifications of Witness.

My name is Edward R. Jagnandan and my business address is 341 Fourth Avenue, The Fidelity Building, Pittsburgh, PA 15222. I am the Executive Director of the Allegheny County Housing Authority ("Authority"), and I have held this position approximately seven months. I am responsible for supervising and managing all of the activities of the Authority, including operations which occur at all of the public housing sites and Section 8 housing developments within Allegheny County, as well as various social services that are provided to the residents at such sites. I am very well acquainted with the Authority's need for service from household goods movers to relocate the residents who are the Authority's clients. I am authorized on behalf of the Authority to submit this Verified Statement in support of this application.

4. General Description of Supporting Party.

The Authority is a municipal authority which has been in existence since approximately 1937 and which currently employs about 250 workers. The Authority receives funding for services from the U.S. Department of Health and Urban Development. The Authority manages 42 housing sites in 37 municipalities throughout Allegheny County. There are over 3,900 residential units at these sites which are occupied by families and elderly persons who qualify for assisted housing. The Authority undertakes both major renovation as well as new construction projects at the sites to refurbish and modernize the units in accord with federal regulations.

The Authority is responsible for coordinating the renovation and construction work so as to minimize the inconvenience to the families and individuals who are affected. In most instances, the residents of the units involved in the renovation or construction projects must be relocated either to other units on site or to units in other public housing or Section 8 housing developments. The Authority lets out for bid contracts to provide household goods moving services. This is a public bid procedure and the lowest responsible bidder is awarded the contract.

On occasions, the Authority must also relocate residents from one site to another for various reasons. For instance, a resident may need to relocate in order to be closer to some type of service provider, such as a doctor's office or an outpatient clinic.

The Authority complies with Allegheny County's policy to encourage participation and involvement by minority owned businesses and women owned businesses. There is a provision in the Authority's contracts for 13% of the work to be performed by minority owned businesses and 2% to be performed by women owned businesses. The Authority also complies with the federal requirements set forth in Section 3 which sets forth goals for employment and training of residents of public housing developments and Section 8 housing.

The Authority is supporting this application so that Georgia P. Carroll Moving Company, which I understand is both a certified minority owned business and a certified women owned business, will be in a position to submit bids for contracts involving relocations of residents at our many sites throughout Allegheny County.

5. Volume and Frequency of Intended Use.

Because of the competitive bidding procedures that the Authority utilizes to insure that the lowest responsible bidder is awarded the contract for moving household goods, the Authority is not in a position to represent that Georgia P. Carroll Moving Company would be utilized to handle any specific number of moves. However, if this Company is awarded the moving contract for one of the upcoming renovation projects, such as George Washington Carver Housing Development in Clairton, there will be about 100 families that will be moved from the site to a temporary location and then, after the renovation is completed, the families

will be given the option to relocate to the renovated units. These renovation projects usually take place over a two to three year period of time.

6. Representative Origins and Destinations.

Each year, depending upon available funding and budget constraints, the Authority renovates existing units or constructs new units at one of the many housing sites in Allegheny County. Attached hereto as Exhibit "A" is a list of the various sites which consists of 42 properties. Exhibit "A" sets forth the number of buildings on each property, which ranges from 1 to as many as 69, and there are over 3,900 units. Each and every one of these sites is a potential origin where resident's goods would be picked up. Each site is also a potential destination where a resident's goods would be delivered. These sites are located at such points as McKees Rocks, Rankin, Duquesne, Sharpsburg, Braddock, Clairton, Morgan, Homestead, East Pittsburgh, Tarentum, Natrona Heights, Wilmerding, Turtle Creek, Carnegie, Brackenridge, Wilksburg, Blawnox, Penn Hills, West View, West Mifflin, Springdale and the East End of Pittsburgh.

7. Type of Service Required.

It is extremely important that the household goods mover which is awarded the contract must be able and willing to work closely with the Authority's staff for coordinating the moves. Time schedules must be adhered to in order not to delay the renovation or new construction work. Service must be available upon request within one or two days notice to handle special or miscellaneous moves. Normally, service is required Monday through Friday. Because the residents of low income housing do not always comply with instruction for placing their goods in boxes, the mover must be able to haul goods which are not packaged. Also, the mover must have a certain amount of tact in order to handle the unusual or out of the ordinary situations that they may encounter. It is essential that the mover have the proper insurance, and that the mover must also have experience in hauling household goods.

8. Similar Applications Supported.

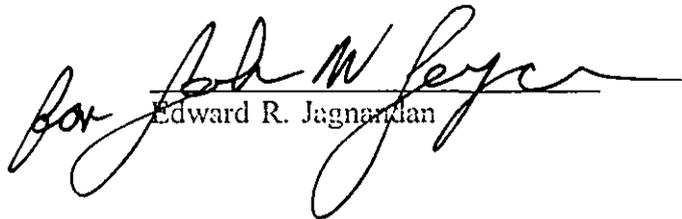
To the best of my knowledge, within the past three years, the Authority has not supported any other motor carrier for similar household goods moving rights.

9. Other Relevant Information.

In the near future, the renovation at the McKees Rocks Terrace site will commence. There are about 120 families residing at this site, and the majority of these families must be moved. Some of them will be relocated on site, and others will be relocated to other sites. Another site which will be renovated in the near future is the George Washington Carver Hall located in Clairton, Allegheny County. There are 100 units located at this site. Next year, we anticipate that the housing development at Groveton in Coraopolis will be involved in the start of another phased relocation project. There will be over 120 families at this site that will have to be moved over several years. I anticipate that the Authority will need a mover to provide service at other projects in the coming years.

It would be advantageous to the Authority to have Georgia P. Carroll Moving Company authorized so that it could be available to provide service for the Authority and so that it could submit a bid for a contract at any of the 42 sites that the Authority manages in Allegheny County. Since the Authority is committed to lending a hand to minority owned business and women owned businesses, approval of this application will promote the Authority's goals. It will also increase competition for the limited amount of funding the Authority has available, and this should assist the Authority in obtaining the highest quality service for the lowest available price.

ALLEGHENY COUNTY
HOUSING AUTHORITY


Edward R. Jagnardian

ACHA Site Data

Revised: 20-Apr-98

SITE	ADDRESS	TOWN	ZIP	PHONE#	FAX#	MANAGER	R.M.S.	# BLDGS	# UNITS	ACREAGE	# STORIES	BUILT	EFF	1BR	2BR	3BR	4BR
PA-6-2 McKees Rocks Terrace	Howard Drive	McKees Rocks, PA	15136	331-5322	331-3955	Gina Kormick	Joe Kreil	27	288	15.35	2	1942		52	136	76	24
PA-6-3 Hawkins Village	Kenmawr Avenue	Rankin, PA	15104	271-1575	271-2764	Terry Totten	Harry Wetmore	31	165	15.371	2	1942		26	72	48	20
PA-6-4 Bums Heights	Calhoun & High Street	Duquesne, PA	15110	466-7323	469-3984	Luther Dupree	Norman Hill	28	174	14.38	2	1942		34	70	54	16
PA-6-6 Sharps Terrace	Sisca Drive	Sharpsburg, PA	15215	782-1123	782-3184	Kristine Lieberth	Rick Hayden	6	66	1.82	3	1954		12	42	12	
PA-6-7 Hawkins Village Ext.	Kenmawr Avenue	Rankin, PA	15104	271-1575	271-2764	Terry Totten	Harry Wetmore	2	38	3.63	3	1953		12	12	12	
PA-6-8 Uansa Village	Helen & Robb Streets	McKees Rocks, PA	15136	331-9990	331-2884	Emily Morton	Joe Kreil	8	50	3.41	2	1953		10	30	6	4
PA-6-9 Hays Manor	Locust Street	McKees Rocks, PA	15136	771-2044	771-5817	Emily Morton	Joe Kreil	7	98	2.79	3	1954		15	57	18	6
PA-6-10 Maplesview Terrace	Verona Street	Bradnock, PA	15104	351-0511	351-1681	Marion Walkins	Harry Wetmore	8	72	2.71	3	1953		24	36	12	
PA-6-12 Madus Acres	Wylie Avenue	Clairton, PA	15025	233-4871	850-3041	Carl Brown	Norman Hill	7	130	5.96	3	1954		16	78	36	
PA-6-15 Morgan	500 Morgan Drive	Morgan, PA	15064	221-5900	221-2685	Gina Kormick	Joe Kreil	20	149	33.48	2	1955		20	76	45	8
PA-6-17 Blair Heights	Maple Avenue	Clairton, PA	15025	233-5155	850-3004	Carl Brown	Norman Hill	11	148	5.75	3	1942		12	100	39	
PA-6-18 Grovelton Village	Village Drive	Coraopolis, PA	15108	264-3560	264-8226	Gina Kormick	Joe Kreil	23	100	10.14	2	1942		8	66	26	
PA-6-20 Ohioview Acres	Jefferson Drive	McKees Rocks, PA	15136	331-4633	331-4232	Ron Walker	Joe Kreil	69	250	42.6	2	1942		12	174	64	
PA-6-21 Homestead Apts.	411/481 E. Eighth Avenue	Homestead, PA	15120	462-1441	883-3990	Jim Bulls	Harry Wetmore	2	144	2.98	12	1961		46	96		
PA-6-22 Uansa & Hays Ext.	Helen & Robb Streets	McKees Rocks, PA	15136	331-9990	771-8773	Emily Morton	Joe Kreil	9	74	3.14	2&3	1961		17	39	18	
PA-6-23 Prospect Terrace	Prospect Drive	East Pittsburgh, PA	15112	824-4786	372-8244	Terry Totten	Norman Hill	11	94	11.15	2	1955		24	24	31	12
PA-6-24 Golden Tower	Allegheny Street	Tarentum, PA	15084	228-1070	228-9851	Gary Warren	Rick Hayden	1	80	0.75	8	1954	18	44			
PA-6-25 Homestead Apts.	441 East Eighth Avenue	Homestead, PA	15120	462-1441	883-3990	Jim Bulls	Harry Wetmore	1	108	0.604	12	1955	40	68			
PA-6-28 Park Apartments	Municipal Drive	Natrona Heights, PA	15065	226-0577	226-9753	Kristine Lieberth	Rick Hayden	29	122	15.84	2	1941		4	92	26	
PA-6-27 Wilmorng	314 Commerce Street	Wilmorng, PA	15148	823-3472	372-5729	Terry Totten	Norman Hill	1	100	0.5448	11	1968	38	62			
PA-6-28 John Fraser Hall	500 Hunter Street	Turtle Creek, PA	15145	823-8069	372-6759	Terry Totten	Norman Hill	1	98	0.712	10	1972	59	39			
PA-6-28 General Bradnock Tower	820 Sixth Street	North Bradnock, PA	15104	351-1360	351-1889	Marion Walkins	Harry Wetmore	1	181	3.0679	12	1970	5	158			
PA-6-30 Rachel Carson Hall	Second & Wood Streets	Tarentum, PA	15084	226-1114	228-9897	Gary Warren	Rick Hayden	1	60	0.73	8	1971	38	22			
PA-6-31 Andrew Carnegie	514 Lydia Street	Carnegie, PA	15106	264-3560	NA	Gina Kormick	Joe Kreil	1	15	0.41	3	1970	6	6	1	2	
PA-6-32 Brackenridge Hall	887 First Avenue	Brackenridge, PA	15014	226-1106	228-9847	Gary Warren	Rick Hayden	1	63	0.55	7	1970	38	25			
PA-6-33 Dumplin Hall	502 Kay Street	Wilkinsburg, PA	15221	371-8313	683-4104	Marion Walkins	Norman Hill	1	60	1.63	7	1971	36	24			
PA-6-34 Nejtley/Burner Apts.	800 Mill Street	Tarentum, PA	15084	226-8374	226-9735	Gary Warren	Rick Hayden	5	60	1.19	3	1971			36	24	
PA-6-35 F.D. Roosevelt Apts.	421 East Eighth Avenue	Homestead, PA	15120	462-1441	683-3996	Jim Bulls	Harry Wetmore	1	100	0.824	11	1972	60	40			
PA-6-36 G.V. Carver Hall	556 Reed Street	Clairton, PA	15025	233-8544	650-5011	Carl Brown	Norman Hill	1	100	1.1472	8	1972	60	40			
PA-6-37 Sheldon Park	Municipal Drive	Natrona Heights, PA	15065	226-1505	226-9753	Kristine Lieberth	Rick Hayden	16	70	10.39	2	1941		20	36	14	
PA-6-39 Robert J. Corbett Apts.	175 Corbett Court	McKnight, PA	15237	386-6150	386-5498	Emily Morton	Rick Hayden	1	105	1.27	7	1972	60	44	1		
PA-6-40 Harry S. Truman Apts.	25 North Second Street	Duquesne, PA	15110	466-8550	469-4207	Luther Dupree	Norman Hill	1	63	0.551	7	1972	38	25			
PA-6-41 Ohioview Tower	250 Jefferson Drive	McKees Rocks, PA	15136	331-4633	331-4232	Ron Walker	Joe Kreil	1	80	1.1376	8	1974	40	20			
PA-6-42 Jefferson Manor	201 Jefferson Road	Penn Hills, PA	15235	241-0289	683-2892	Jim Bulls	Harry Wetmore	1	95	1.2698	7	1965		85			
PA-6-43 Blawnox Apts.	701 Center Avenue	Blawnox, PA	15238	828-0138	828-2458	Gary Warren	Rick Hayden	1	90	0.8273	8	1981		89	1		
PA-6-45 Penn Hills Scattered Sites	Varies	Penn Hills, PA	15235	371-8333	271-2764	Marion Walkins	Harry Wetmore	13	13	varies	2	varies			4	8	
PA-6-46 West View Tower	890 West View Park Drive	West View, PA	15229	931-6373	386-8491	Ron Walker	Rick Hayden	1	100	1.206	11	1982		100			
PA-6-50 West Mifflin Manor	2400 Sharp Avenue	West Mifflin, PA	15122	466-4111	466-3996	Luther Dupree	Norman Hill	1	107	1.3907	8	1984		107			
PA-6-50 Springdale Manor	504 Pittsburgh Street	Springdale, PA	15144	274-7303	820-7011	Kristine Lieberth	Rick Hayden	1	90	0.794	8	1984		80			
PA-6-64 Allegheny Estates	Varies	East End, PA	varies	371-8333	271-2764	Marion Walkins	Harry Wetmore	5	5	varies	varies	varies				4	1
TOTALS								347	3935				534	1400	1279	576	91

Glenshaw Gardens	1008 Glenshaw Place	Glenshaw, PA	15116	487-7320	NA	Kristine Lieberth	Rick Hayden	8	30		2						
Harrison High-Rise	2036 Broadview Blvd.	Natrona Heights, PA	15065	224-6330	NA	Kristine Lieberth	Rick Hayden	1	103	1.0442	8	1979		102	1		

Jim Reynolds Central Property Manager - Regions 1 & 2

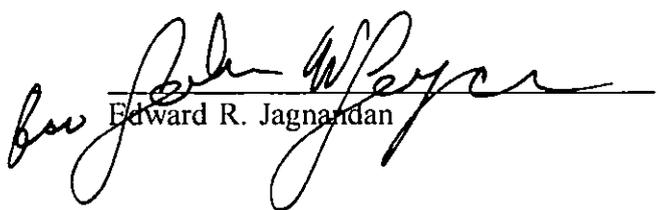
Tim Gbble Central Property Manager - Regions 3 & 4

Exhibit "A"

VERIFICATION

The undersigned deposes and says that he is authorized and does make this Verification and that the facts set forth in the foregoing Verified Statement of Edward R. Jagnandan are true and correct to the best of his knowledge, information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 related to unsworn falsification to authorities.

Date: 6/2/98


Edward R. Jagnandan

VERIFIED STATEMENT OF DAVID I. CONNELLY

ON BEHALF OF HOUSING OPPORTUNITIES UNLIMITED, INC.

1. Applicant's Name and Docket No. of the Application Supported.

Applicant's name is Jenks, Inc. t/d/b/a Georgia P. Carroll Moving Company and the Applicant's Docket No. is A-0013657, F.1, Am-A.

2. Legal Name and Domicile Of Supporting Party.

This Verified Statement is being submitted on behalf of Housing Opportunities Unlimited, Inc. ("HOU"), which is a corporation with its business headquarters located in Milton, MA, which is in the Boston Metropolitan area.

3. Name and Qualifications of Witness.

My name is David I. Connelly and my business address is 11 High Street, Milton, MA 02186. I am the President of HOU which is a for-profit corporation and I have held this position for the past 20 years. I am the Chief Operating Officer of HOU and I supervise all of our company's operations, including the work at Aliquippa Terrace which is located in the City of Pittsburgh, PA. I am familiar with my company's needs for household goods moving service at Aliquippa Terrace, and I am authorized on behalf of HOU to submit this Statement.

4. General Description of Supporting Party.

HOU is a resident service and relocation company. My company has been awarded a contract by the City of Pittsburgh Housing Authority to manage and coordinate the relocation of residents of Aliquippa Terrace in connection with a renewal effort that is in progress. We understand that Aliquippa Terrace is going to be turned over to a private owner and we have also made arrangements to continue to provide our services once title to the property is transferred to the new owner.

My company's contract provides that we will be responsible for managing and supervising the relocation of 900 families that are residents of the Aliquippa Terrace public housing project so that 850 new units can be constructed. These new dwellings will consist of 500 publicly subsidized units and 350 market rate units. The residents are being moved to a number of different types of housing including Section 8 housing, other housing projects and some will move into private homes which they will own. In addition, a number of residents will be moved from the present housing to on-site housing on the Aliquippa Terrace

project. After the new units are constructed, about 350 present or former tenants of this housing project will be moved into the new units. This relocation is subject to a federal law known as the Uniform Relocation Act, and HOU is required to comply with all of the federal rules and regulations.

HOU conducts similar operations in the eastern United States, and we presently have projects in progress in five other states at this time. My company's personnel are experienced in managing major relocation operations such as the one at Aliquippa Terrace. Under the contract with the Housing Authority, my company has the responsibility of making arrangements with a household goods mover to relocate any resident who wishes to have his furnishings transported by a professional mover. My company not only coordinates the arrangements between the mover and the resident, but also pays the mover's transportation charges.

5. Volume and Frequency of Intended Use and Representative Origins of Destinations.

HOU would like to be able to use the services of Georgia P. Carroll Moving Company primarily to handle all of the relocation moves at Aliquippa Terrace and at any other project in Allegheny County that we may be awarded in the future. I understand that Georgia P. Carroll Moving Company is presently authorized to provide household goods moving service within the City of Pittsburgh. The majority of the moves from Aliquippa Terrace are to locations within the City's limits. However, on occasion, residents request that their goods be moved to a location outside of the City of Pittsburgh, such as Homewood. A list of some other locations where residents have been moved to that are outside of the City of Pittsburgh is attached to my Statement as Exhibit "A". It is impossible to predict how many residents in the future will select the option of moving to temporary or permanent housing outside of Pittsburgh, and there is no way of knowing how many times the services of Georgia P. Carroll Moving Company will be utilized. However, we would like to be able to use its services to handle the moves at Aliquippa Terrace.

In addition to arranging and paying for the moves from Aliquippa Terrace, my company is also responsible for paying to have the residents moved back into Aliquippa Terrace once the new units are completed. We anticipate that there will be about 350 families in this category which will need service from wherever they are located back to Aliquippa

Terrace. Here again, there is simply no way of predicting where these residents will be living at the time or where their furniture will have to be picked up at. However, it would be very beneficial to my company if Georgia P. Carroll Moving Company had broad authority so that it could provide us with a complete service and so that we do not have to locate and deal with another carrier.

6. Type of Service Required.

HOU needs a motor carrier which provides high quality service in handling the goods of tenants at reasonable rates. It is very important that the mover be dependable because we have to coordinate the relocation of entire families so that there is the least amount of disruption and inconvenience in their lives. This means that the mover must arrive on schedule and have sufficient workers so that the household goods can be loaded and delivered to their destination all on the same day and in compliance with the established schedule. If the goods are not moved on schedule, this creates scheduling conflicts and complications and the tenants may become understandably angry and frustrated when the set plan is not followed.

In most instances, tenants that are being relocated use the boxes that we provide them to pack their belongings. However, in some cases such as when elderly persons are being relocated, we request that the mover take care of boxing the tenant's belongings before he or she is moved.

The moving van that is used to haul the goods must be enclosed to protect the tenant's household goods from damage while in transit. Also, the movers must be experienced in not only providing household goods service, but also in dealing with the problems that can be encountered when relocating a tenant from a public housing project.

In order to foster good community relations within Aliquippa Terrace, we encourage, but do not require, that the mover hire residents of the development. This creates opportunities that would otherwise not be available to the residents, and it also creates a sense that the mover is offering to contribute to the improvement of the lives of the residents.

8. Similar Applications Supported.

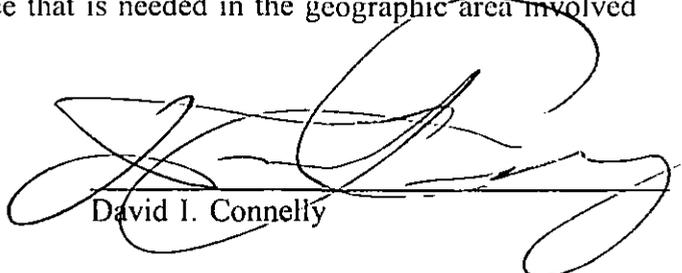
HOU has never supported any motor carrier for PUC operating authority similar to that involved in the application of Georgia P. Carroll Moving Company.

9. Other Relevant Information.

HOU has utilized the services of Carroll Moving at Aliquippa Terrace in providing service to points in the City of Pittsburgh, and we have been very please with its service. Carroll Moving has done a good job in providing high quality service in meeting all of our service requirements in moving the tenants at Aliquippa Terrace. Equipment is provided in a timely manner and the loading and unloading of the tenant's furnishings is handled in a professional manner. Pursuant to our request, Georgia P. Carroll Moving Company has hired some residents of Aliquippa Terrace.

HOU has a good track record in using the services of Georgia P. Carroll Moving Company. My company is very much interested in having this moving company expand its operating authority so that it holds operating rights to provide service for my company within the greater Pittsburgh Metropolitan area. My company is always soliciting new business and there is a possibility that, based upon our successful operations at Aliquippa Terrace, we may be awarded the relocation contract of other housing projects within Allegheny County.

Housing Opportunities Unlimited, Inc. respectfully requests that the Commission approve this application so that the equipment and services of Georgia P. Carroll Moving Company will be available to provide service that is needed in the geographic area involved in this application.



David I. Connelly

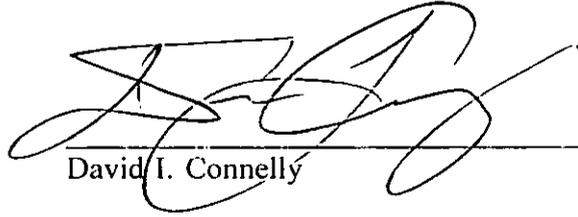
VERIFICATION

I verify that the statements made in the foregoing Statement of David I. Connelly on behalf of Housing Unlimited Opportunities, Inc. are true and correct to the best of my knowledge, information and belief. I understand that all statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Dated: _____

6/10/98

David I. Connelly



III. CONCLUSION

For all of the foregoing reasons, Applicant Jenks, Inc., t/d/b/a Georgia P. Carroll Moving Company submits that the foregoing Verified Statements establish that there is a public demand or need for Applicant's proposed service, that Applicant is fit, willing and able to provide the proposed household goods moving service, and that approval of this unopposed application will promote the public interest.

Respectfully submitted,
Wick, Streiff, Meyer,
O'Boyle & Szeligo, P.C.



David M. O'Boyle, Esquire
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Pittsburgh, PA 15219
(412) 765-1600
Attorneys for Applicant
Jenks, Inc., t/d/b/a
Georgia P. Carroll Moving Company