

ALJ APPEARANCE SHEET

ALJ Hearing Report

Docket No. A-00114058

Case Name Application of Stacia H. Grove,
t/d/b/a Central PA Limousine Service

Location Harrisburg

Date December 16, 1997

ALJ Weismandel

Reporting Firm COMMONWEALTH REPORTING

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held YES NO

Hearing Held YES NO

Testimony Taken YES NO

Transcript Due YES NO

Hearing Concluded YES NO

Further Hearing Needed YES NO

Estimated Add'l Days Two (2)

RECORD CLOSED YES NO

Briefs to Be Filed YES NO
DATE DEC 19 1997

BENCH DECISION YES NO

RECEIVED
OFFICE OF C.A.L.J.
97DEC16 PM 3:02
PA PUC

DOCUMENT
FOLDER

REMARKS: FURTHER HEARING FEBRUARY 24
AND 25, 1998.

Names, Addresses and Telephone Numbers of Parties or Counsel of Record
PLEASE PRINT CLEARLY

Incomplete Information may Result in Delay of Processing

Name and Telephone Number	Address			Appearing for
Scott W. Pohlman Robinson & Geraldo Telephone No. 717-232-8525	P.O. Box 5320 City <u>Harrisburg</u> State <u>PA</u> Zip <u>17110</u>			<u>Unique Limousine</u> <u>Villa White Rose</u> <u>Keystone</u> - Supervisor - Transportation Services - Ray Bensch
Benjamin C. Dunlap, Jr. Neuman, Smith, Shissler & Hall Telephone No. 717-236-3010	200 N. Third Street P.O. Box 840 City <u>Harrisburg</u> State <u>PA</u> Zip <u>17108</u>			<u>Stacia Grove,</u> <u>PROTHONOTARY'S OFFICE</u> <u>PA PUC</u> <u>97 DEC 18 AM 9:08</u> RECEIVED
Telephone No.	City	State	Zip	
Telephone No.	City	State	Zip	

Check this box if additional parties or counsel of record appear on back of form.

Joseph A. Valencik
REPORTER
LRC, Inc.

ALJ APPEARANCE SHEET

ALJ Hearing Report

Docket No. **A-00114058**

Case Name **Application of Stacia H. Grove,
t/d/b/a Central PA Limousine Service**

Location **Harrisburg**

Date **December 17, 1997**

ALJ **Weismandel**

Reporting Firm **COMMONWEALTH REPORTING**

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held YES NO

Hearing Held YES NO

Testimony Taken 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

DATE _____

DOCKETED
DEC 22 1997

REMARKS: **DOCUMENT FOLDER**

Cancelled
Continued

RECEIVED
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Names, Addresses and Telephone Numbers of Parties or Counsel of Record
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Name and Telephone Number	Address			Appearing for
Telephone No.	City	State	Zip	RECEIVED 97 DEC 18 AM 9:08 PA PUC PROTHONOTARY'S OFFICE
Telephone No.	City	State	Zip	
Telephone No.	City	State	Zip	
Telephone No.	City	State	Zip	

Check this box if additional parties or counsel of record appear on back of form.

REPORTER _____

DOCUMENT
FOLDER

Act 294

Case Identification:

A-00114058; Application of
Stacia H. Grove, t/d/b/a
Central Pennsylvania Limousine
Service

DOCKETED

JAN 02 1998

Initial Decision By:

ALJ Wayne L. Weismandel

Deadline for Return to OSA:

December 26, 1997

This decision has not been reviewed by OSA.

RECEIVED

DEC 30 1997

* * * * *

OFFICE OF SPECIAL
ASSISTANTS

I want full Commission review of this decision.

Commissioner

Date

I do not want full Commission review of this decision.

W. A. J...

Commissioner

12-29-97

Date

RECEIVED
98 JAN - 2 AM 9:37
PA.P.U.C.
PROTHONOTARY'S OFFICE

Act 294

Case Identification: A-00114058; Application of
Stacia H. Grove, t/d/b/a
Central Pennsylvania Limousine
Service

Initial Decision By: ALJ Wayne L. Weismandel

Deadline for Return to OSA: December 26, 1997

This decision has not been reviewed by OSA.

RECEIVED

DEC 30 1997

* * * * *

OFFICE OF SPECIAL
ASSISTANTS

I want full Commission review of this decision.

Commissioner

Date

I do not want full Commission review of this decision.

Robert R. Blom OCS
Commissioner

12/24/97
Date

RECEIVED
98 JAN - 2 AM 9:37
PAPUC
PROTHONOTARY'S OFFICE

Act 294

Case Identification: A-00114058; Application of
Stacia H. Grove, t/d/b/a
Central Pennsylvania Limousine
Service

Initial Decision By: ALJ Wayne L. Weismandel

Deadline for Return to OSA: December 26, 1997

This decision has not been reviewed by OSA.

RECEIVED

* * * * *

DEC 30 1997

OFFICE OF SPECIAL
ASSISTANT

I want full Commission review of this decision.

Commissioner

Date

I do not want full Commission review of this decision.

x John Hanger

Commissioner

DEC 30 1997

Date

RECEIVED
98 JAN - 2 AM 9:37
PAPUC
PROTHONOTARY'S OFFICE

Act 294

Case Identification: A-00114058; Application of
Stacia H. Grove; t/d/b/a
Central Pennsylvania Limousine
Service

Initial Decision By: ALJ Wayne L. Weismandel

Deadline for Return to OSA: December 26, 1997

This decision has not been reviewed by OSA.

RECEIVED

* * * * *

DEC 24 1997

OFFICE OF SPECIAL
ASSISTANT

I want full Commission review of this decision.

Commissioner

Date

I do not want full Commission review of this decision.

David H. Volka /js
Commissioner

12-24-97
Date

PROTHONOTARY'S OFFICE
P.A.P.U.C.

98 JAN -2 AM 9:37

RECEIVED

RECEIVED
DEC 16 1997
OFFICE OF SPECIAL ASSISTANT

Act 294

Case Identification: A-00114058; Application of
Stacia H. Grove, t/d/b/a
Central Pennsylvania Limousine
Service

Initial Decision By: ALJ Wayne L. Weismandel

Deadline for Return to OSA: December 26, 1997

This decision has not been reviewed by OSA.

RECEIVED

DEC 30 1997

* * * * *

OFFICE OF SPECIAL
ASSISTANTS

I want full Commission review of this decision.

Commissioner

Date

I do not want full Commission review of this decision.

Nora Mae Crowell

Commissioner

12-26-97

Date

RECEIVED
08 JAN -2 AM 9:37
P.A.P.U.C.
PROTHONOTARY'S OFFICE



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

IN REPLY PLEASE
 REFER TO OUR FILE

January 6, 1998

In Re: A-00114058

(See letter dated 10/20/97)

Application of Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine Service

For the right to begin to transport, as a common carrier, by motor vehicle, persons, in limousine service, between points in the counties of York, Lancaster and Dauphin, and from points in the said territory, to points in Pennsylvania, and return.

Hearing Notice

This is to inform you that a hearing on the above-captioned case will be held as follows:

Type: **Further Hearings**

Date: **Tuesday, February 24, 1998**
Wednesday, February 25, 1998

Time: **10:00 a.m.**

Location: **In an available hearing room**
Ground Floor
North Office Building
North Street and Commonwealth Avenue
Harrisburg, Pennsylvania

Presiding Officer: **Administrative Law Judge Wayne L. Weismandel**
P.O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 783-5452

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DOCUMENT 1998
FOLDER

RECEIVED
 98 JAN -8 AM 9:23
 P.A.P.U.C.
 PROTHONOTARY'S OFFICE

Please mark your records accordingly.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5988.

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

DATE: January 9, 1998

SUBJECT: A-00114058

TO: Office of Administrative Law Judge
Annette Shelley

FROM: James J. McNulty
Secretary
NVL

APPLICATION OF STACIA H. GROVE, T/D/B/A
CENTRAL PENNSYLVANIA LIMOUSINE SERVICE

The Initial Decision has been served upon all parties of interest.

Neither exceptions nor requests for review from the Commissioners have been received by the Commission. This matter is referred to your office for whatever action you deem necessary.

cc: Office of Special Assistants

JOCKETED
JAN 20 1998

P.S. Please note that exceptions or reply exceptions may come in timely with certificates of mailings. A second memo will not be released for these exceptions.

~~REPORT
FOLDER~~
DOCUMENT
FOLDER

LAW OFFICES
NAUMAN, SMITH, SHISSLER & HALL

ORIGINAL

18TH FLOOR
200 NORTH THIRD STREET
P. O. BOX 840

HARRISBURG, PENNSYLVANIA 17108-0840

SPENCER G. NAUMAN, JR.
JOHN C. SULLIVAN
J. STEPHEN FEINOUR
CRAIG J. STAUDENMAIER
BENJAMIN C. DUNLAP, JR.
STEPHEN J. KEENE

TELEPHONE
(717) 236-3010
TELEFAX
(717) 234-1925

COUNSEL
RALPH W. BOYLES, JR.
DAVID C. EATON
DIRECT E-MAIL ADDRESS
NSSH@REDROSE.NET

**DOCUMENT
FOLDER**

February 4, 1998

HAND DELIVERED

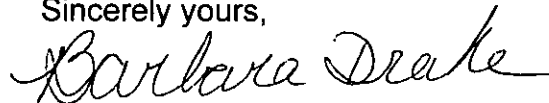
James McNulty, Prothonotary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

RE: STACIA H. GROVE t/d/b/a Central Pennsylvania Limousine Service (562 East Heatherfield Way, Red Lion, York County, PA 17345) - persons in limousine service between points in the counties of York, Lancaster, and Dauphin, and from points in the said territory to points in Pennsylvania and return; A-00114058

Dear Sir:

I enclose an original and three (3) copies of the Motion for Sanctions for filing in the above matter. In accordance with the accompanying Certificate of Service we have provided copies of the Motion to all active parties of record. Please time-stamp the original and all copies and return a time-stamped copy to our messenger. Thank you for your assistance.

Sincerely yours,



Barbara Drake
Secretary to
Benjamin C. Dunlap, Jr., Esquire

/bmd
Enclosures
cc: All Parties of Record
Stacia H. Grove
ALJ Wayne L. Weismandel

PROTHONOTARY'S OFFICE

98 FEB -4 PM 4:02

15

ORIGINAL

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE:

**STACIA H. GROVE t/d/b/a
CENTRAL PENNSYLVANIA
LIMOUSINE SERVICE (562 East
Heatherfield Way, Red Lion, York
County, PA 17356) - persons in
limousine service between points in
the counties of York, Lancaster,
and Dauphin, and from points in the
said territory to points in
Pennsylvania and return**

A-00114058

**DOCUMENT
FOLDER**

PROthonary's OFFICE
93 FEB -4 PM 11:02

MOTION FOR SANCTIONS

Applicant Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), by her counsel, Nauman, Smith, Shissler & Hall, files this motion for sanctions against Protestants White Rose Limousine, Inc. ("White Rose"); Unique Limousine Service, Inc. ("Unique"); Keystone Limousine, Inc. ("Keystone"); and Salgals Inc. t/d/b/a Villa Limousine Service ("Villa"), pursuant to 52 Pa. Code §§ 5.371-2, based upon the following:

1. On December 19, 1997, Grove filed interrogatories and document requests directed to White Rose, Unique, Keystone and Villa. Copies of those discovery requests with the Protestants' responses thereto are attached hereto as Exhibits A, B, C & D, respectively.

2. In the aforementioned discovery requests, Grove requested copies of each Protestant's audited financial statements, if such exist, or copies of any compilation or review of each corporation's finances by a certified public account, a bookkeeping service provider or any other

DOCKETED

FEB 10 1998

person, for the past three fiscal years; copies of each Protestant's corporate tax returns for the past three fiscal years; and copies of any reports regarding each Protestant's finances submitted to the Pennsylvania Public Utility Commission within the past three reporting years, including, but not limited to, assessment reports submitted to the Commission pursuant to 52 Pa. Code § 29.43. See Exhibits "A", "B", "C" and "D" at ¶¶ 5, 6, 8.

3. In response to the request for financial statements and corporate tax returns, each of the Protestants responded that the requested documents are "privileged and proprietary information." The Protestants further responded that "relevant financial records are available through the Public Utility Commission." *Id.* at ¶¶ 5, 6.

4. In response to the requests for any financial reports submitted to the Public Utility Commission, each of the Protestants responded that "such reports are a matter of public record and available at the Public Utility Commission." *Id.* at ¶ 8.

5. None of the aforementioned requested documents are matters of public record available through the Public Utility Commission.

6. No Protestant filed objections to any of the aforementioned discovery requests nor did any Protestant file a request for a protective order within the applicable time constraints or at any time thereafter. See 52 Pa. Code §§ 5.342(d)(1), 5.423(b)(4).

7. The Protestants propounded substantively similar interrogatories and document requests regarding Grove's finances to which Grove fully responded prior to the initial hearing.

8. At the initial hearing of this matter on December 16, 1997, following Grove's request that sanctions be imposed for the Protestants' failure to respond to the aforementioned discovery requests, the Protestants preliminarily agreed to supply Grove with assessment reports filed with the Commission and to later address the supplying of the requested financial statements and tax returns if the assessment reports did not meet Grove's needs. N.T. 26-32, 108-9.

9. The Protestants subsequently supplied Grove with the 1995 and 1996 assessment reports filed with the Commission for Unique, White Rose and Villa. No assessment reports were supplied for Keystone.

10. The aforementioned assessment reports provide only information regarding each Protestant's gross operating revenues, gross intrastate operating revenues and gross interstate operating revenues. These reports provide no information regarding profitability or other indicators of the financial health of the company. See, *e.g.*, Exhibit "E" attached hereto.

11. Information regarding the profitability and financial health of the Protestants is essential for Grove to conduct effective cross examination as to the Protestants' contentions in their amended protests that "[e]ntry of the Applicant would endanger and impair the operations of existing carriers . . . including this Protestant, and would be contrary to the public interest" and that approval

of Grove's application "would create new unwarranted competition to the detriment of Protestant and other operators and ultimately the public, tending to deprive Protestant of customers and revenues, which are needed to maintain a safe transportation system." The requested corporate tax returns and financial statements are therefore relevant to the subject matter involved in this proceeding. 52 Pa. Code § 5.321(c).

12. Protestants have the burden of establishing "that the entry of a new carrier into the field would endanger or impair the operations of existing common carriers to an extent that, on balance, the granting of authority would be contrary to the public interest." 52 Pa. Code § 41.14(c). Pursuant thereto, the requested corporate tax returns and financial statements are relevant to the subject matter involved in this proceeding. 52 Pa. Code § 5.321(c).

13. Grove has informed counsel for the Protestants that the assessment reports supplied do not provide sufficient information to enable Grove to conduct effective and informed cross examination as to the financial matters put at issue by the Protestants and as to which they have the burden of proof, yet they refused to supply the requested corporate tax returns and financial statements and continue to refuse to do so.

WHEREFORE, Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service requests that the Commission or presiding officer enter an Order establishing as a designated fact that the entry of Grove into the field would not endanger or impair the operations of existing common carriers to an extent that, on balance, the granting of authority would be contrary to the public

interest. Alternatively, Grove requests that the Commission or presiding officer enter an Order prohibiting the Protestants from introducing into evidence any documents or testimony in support of their claim that the approval of Grove's application "would create new unwarranted competition to the detriment of Protestant and other operators and ultimately the public, tending to deprive Protestant of customers and revenues, which are needed to maintain a safe transportation system" or that "[e]ntry of the Applicant would endanger and impair the operations of existing carriers . . . including this Protestant, and would be contrary to the public interest." Grove further requests that the Protestants be ordered to pay her counsel fees of \$270.00 incurred in the preparation and filing of this motion.

RESPECTFULLY SUBMITTED,

NAUMAN, SMITH, SHISSLER & HALL

By *Benjamin C. Dunlap, Jr.*
Benjamin C. Dunlap, Jr., Esquire
Supreme Court I.D. #66283

200 North Third Street, 18th Floor
P. O. Box 840
Harrisburg, PA 17108-0840
717-236-3010
Attorney for Stacia H. Grove t/d/b/a Central
Pennsylvania Limousine Service

Date: *February 4, 1998*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**


IN RE: :
STACIA H. GROVE t/d/b/a : A-00114058
CENTRAL PENNSYLVANIA :
LIMOUSINE SERVICE (562 East :
Heatherfield Way, Red Lion, York :
County, PA 17356) - persons in :
limousine service between points in :
the counties of York, Lancaster, :
and Dauphin, and from points in the :
said territory to points in :
Pennsylvania and return :

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing "**Motion for Sanctions**" in the above
action, this day by **HAND DELIVERY**, addressed to:

SERVICE LIST

Scott Pohlman, Esquire
Robinson & Geraldo
4407 North Front Street
P. O. Box 5320
Harrisburg, PA 17110
Counsel for Protestants, Salgals, Inc. t/d/b/a Villa Limousine Service,
Keystone Limousine, Inc., White Rose Limousine, Inc. and
Unique Limousine Service, Inc.



Barbara Drake, Secretary to
Benjamin C. Dunlap, Jr., Esquire

Dated: February 4, 1998

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: :
Stacia H. Grove t/d/b/a : A-00114058
CENTRAL PENNSYLVANIA LIMOUSINE :
SERVICE (562 East Heatherfield :
Way, Red Lion, York County, Pa :
17356) - Persons in limousine :
service between points in the :
counties of York, Lancaster, :
Dauphin, and from points in the :
said territory to points in :
Pennsylvania and return :

ANSWERS TO APPLICANT'S INTERROGATORIES AND DOCUMENT
REQUESTS DIRECTED TO WHITE ROSE LIMOUSINE, INC.

1. Specify, with particularity, each and every fact in support of the contention contained in White Rose's Protest that "[e]ntry of the Applicant would endanger and impair the operations of existing carriers" in Dauphin and York counties and "would be contrary to the public interest."

The approval of an applicant which does not meet the need and fitness criteria as established by the Public Utility Commission is harmful to both the public and the limousine industry. The facts supporting the Protestant's protest will be based upon the applicants evidence and testimony.

2. Attach hereto any documents in support of your answer to Interrogatory No. 1 and explain how those documents relate to and support your answer.

NONE.

3. Describe with particularity and list each and every fact in support of the contention in White Rose's Protest that approval of Applicant's application "would create new unwarranted competition to the detriment of Protestant and other operators and ultimately the public, tending to deprive Protestant of customers and revenues, which are needed to maintain a safe transportation system."

A specific need for service has not been identified sufficient to support the applicant's requested authority. Therefore, the applicant would be taking customers and revenue from existing carriers who rely upon those customers for revenue. If a company does not have revenue they are not able to operate their service or maintain safe vehicles.

4. Attach hereto any documents in support of your answer to Interrogatory No. 3 and explain how those documents relate to and support your answer.

NONE.

5. Attach hereto a copy of White Rose's audited financial statements, if such exist, and if not, a copy of any compilation or review of the corporation's finances by a certified public accountant, a bookkeeping service provider or any other person, for the past three fiscal years.

The financial statements of the Protestant are privileged and proprietary information. The relevant financial records are available through the Public Utility Commission.

6. Attach hereto a copy of Protestant's corporate tax returns for the past three (3) fiscal years.

The financial statements of the Protestant are privileged and proprietary information. The relevant financial records are available through the Public Utility Commission.

7. Attach hereto a copy of Protestant's sales journal, also known as a cash receipts journal or a fare journal, for the past three (3) fiscal years.

All such reports are a matter of public record and available at the Public Utility Commission.

8. Attach hereto copies of any reports regarding White Rose's finances submitted to the Pennsylvania Public Utility Commission within the past three (3) reporting years, including, but not limited to, assessment reports submitted to the Commission pursuant to 52 Pa. Code §29.43.

All such reports are a matter of public record and available at the Public Utility Commission.

9. Attach hereto copies of Protestant's excise or gasoline tax reports for liquid fuel taxes made within the past three (3) reporting years.

All such reports are a matter of public record and available at the Public Utility Commission.

10. Attach hereto copies of all exhibits which Protestant intends to introduce at the hearing for this matter, and explain the purpose for which each exhibit will be introduced.

The Protestant intends to introduce a faxed memorandum from Gary Getty at York International to contradict the testimony of one of the Applicant's witnesses. A copy of said memorandum is attached as exhibit "A".

TO: Jim Salinger - White Rose Limousine
Fax - 852-0645

FROM G. W. Getz

SUBJECT: York International Reservations

In an effort to reconfirm earlier conversations with regards to our reservation process, see that all reservation agents that handle reservations for York International receive a copy of this memo.

"Effective immediately, all reservations for York International travel to and from ^{ANY} [redacted] airport must be requested by American Express Travel. No reservations should be accepted by any individual traveler and/or their secretaries."

The only exceptions to this would be the following individuals;

Mr. Robert Pokelwaldt	Mr. Dean DuCray
Mr. Wayne Keunedy	Mr. Scott Boxer
Mr. James Bledsoe	Mr. Thomas Washburne
Mr. Victor McCloskey	Mr. Joseph Smith
Mrs. Jane Davis	Mr. Peter Spellar
Mr. Richard Hoover	

Region 3 YORKIS

Administrative Assistants:

Linda Sites	Nancy Miller	Ramonda Wentz
Marge Howe	Linda Campbell	Penny Ness
Lynn Helfrick	Barbara Blymaire	Margo Kohr

Sincerely,

Guy Getz

Guy Getz
Corporate Travel Manager

9am
FAX - 851-1114

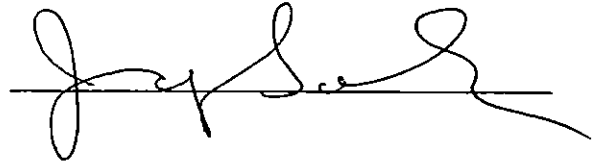
JDC
771-6624

1/11/85

Exhibit
A

VERIFICATION

I, James Salinger, the undersigned do hereby state that the statements set forth in the foregoing Answers to Interrogatories and Document Requests of the Applicant are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read 'James Salinger', is written over a horizontal line.

Dated: December 12, 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION


IN RE: :
Stacia H. Grove t/d/b/a : A-00114058
CENTRAL PENNSYLVANIA LIMOUSINE :
SERVICE (562 East Heatherfield :
Way, Red Lion, York County, Pa :
17356) - Persons in limousine :
service between points in the :
counties of York, Lancaster, :
Dauphin, and from points in the :
said territory to points in :
Pennsylvania and return :

I hereby certify that I served the foregoing "Answers to Interrogatories and Document Requests" in the above action, this day by hand delivery to:

SERVICE LIST

Benjamin C. Dunlap, Jr., Esquire
NAUMAN, SMITH, SHISSLER & HALL
200 North Third Street, 18th Floor
P.O. BOX 840
Harrisburg, PA 17108-0840

ROBINSON & GERALDO

By 
Scott W. Pohlman, Esquire
Attorney I.D. No. 78004
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110
(717) 232-8525

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: :
Stacia H. Grove t/d/b/a : A-00114058
CENTRAL PENNSYLVANIA LIMOUSINE :
SERVICE (562 East Heatherfield :
Way, Red Lion, York County, Pa :
17356) - Persons in limousine :
service between points in the :
counties of York, Lancaster, :
Dauphin, and from points in the :
said territory to points in :
Pennsylvania and return :

ANSWERS TO APPLICANT'S INTERROGATORIES AND DOCUMENT
REQUESTS DIRECTED TO UNIQUE LIMOUSINE SERVICE, INC.

1. Specify, with particularity, each and every fact in support of the contention contained in Unique's Protest that "[e]ntry of the Applicant would endanger and impair the operations of existing carriers" in Dauphin County and "would be contrary to the public interest."

The approval of an applicant which does not meet the need and fitness criteria as established by the Public Utility Commission is harmful to both the public and the limousine industry. The facts supporting the Protestant's protest will be based upon the applicants evidence and testimony.

2. Attach hereto any documents in support of your answer to Interrogatory No. 1 and explain how those documents relate to and support your answer.

NONE.

3. Describe with particularity and list each and every fact in support of the contention in Unique's Protest that approval of Applicant's application "would create new unwarranted competition to the detriment of Protestant and other operators and ultimately the public, tending to deprive Protestant of customers and revenues, which are needed to maintain a safe transportation system."

A specific need for service has not been identified sufficient to support the applicant's requested authority. Therefore, the applicant would be taking customers and revenue from existing carriers who rely upon those customers for revenue. If a company does not have revenue they are not able to operate their service or maintain safe vehicles.

4. Attach hereto any documents in support of your answer to Interrogatory No. 3 and explain how those documents relate to and support your answer.

NONE.

5. Attach hereto a copy of Unique's audited financial statements, if such exist, and if not, a copy of any compilation or review of the corporation's finances by a certified public accountant, a bookkeeping service provider or any other person, for the past three fiscal years.

The financial statements of the Protestant are privileged and proprietary information. The relevant financial records are available through the Public Utility Commission.

6. Attach hereto a copy of Protestant's corporate tax returns for the past three (3) fiscal years.

The financial statements of the Protestant are privileged and proprietary information. The relevant financial records are available through the Public Utility Commission.

7. Attach hereto a copy of Protestant's sales journal, also known as a cash receipts journal or a fare journal, for the past three (3) fiscal years.

The financial statements of the Protestant are privileged and proprietary information. The relevant financial records are available through the Public Utility Commission.

8. Attach hereto copies of any reports regarding Unique's finances submitted to the Pennsylvania Public Utility Commission within the past three (3) reporting years, including, but not limited to, assessment reports submitted to the Commission pursuant to 52 Pa. Code §29.43.

All such reports are a matter of public record and available at the Public Utility Commission.

9. Attach hereto copies of Protestant's excise or gasoline tax reports for liquid fuel taxes made within the past three (3) reporting years.

All such reports are a matter of public record and available at the Public Utility Commission.

10. Attach hereto copies of all exhibits which Protestant intends to introduce at the hearing for this matter, and explain the purpose for which each exhibit will be introduced.

The Protestant intends to introduce a faxed memorandum from Gary Getty at York International to contradict the testimony of one of the Applicant's witnesses. A copy of said memorandum is attached as exhibit "A".

TO: Jim Salinger - White Rose Limousine
Fax - 852-0045

FROM: G. W. Getz

SUBJECT: York International Reservations

In an effort to reconfirm earlier conversations with regards to our reservation process, see that all reservation agents that handle reservations for York International receive a copy of this memo.

Effective immediately, all reservations for York International travel to and from ~~any~~ ^{ANY} airport must be requested by American Express Travel. No reservations should be accepted by any individual traveler and/or their secretaries."

The only exceptions to this would be the following individuals;

- | | |
|-----------------------|----------------------|
| Mr. Robert Pokelvaldt | Mr. Dean DuCray |
| Mr. Wayne Keunedy | Mr. Scott Boxer |
| Mr. James Bledsoe | Mr. Thomas Washburne |
| Mr. Victor McCloskey | Mr. Joseph Smith |
| Mrs. Jane Davis | Mr. Peter Spellar |
| Mr. Richard Hoover | |

Japan 3 York IS

Administrative Assistants:

- | | | |
|---------------|-----------------|---------------|
| Linda Sites | Nancy Miller | Ramouda Wentz |
| Marge Howe | Linda Campbell | Penny Ness |
| Lynn Heltrick | Barbara Blymire | Margo Kohr |

Sincerely,

Gary Getz
Corporate Travel Manager

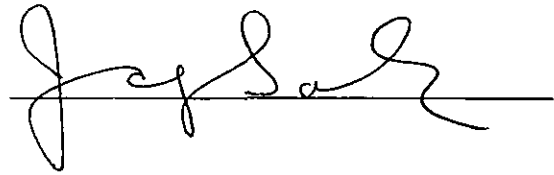
*gary
FAX - 851-1114*

*JAC
771-6624*

Exhibit
A

VERIFICATION

I, James Salinger, the undersigned do hereby state that the statements set forth in the foregoing Answers to Interrogatories and Document Requests of the Applicant are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "James Salinger", is written over a horizontal line.

Dated: December 12, 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

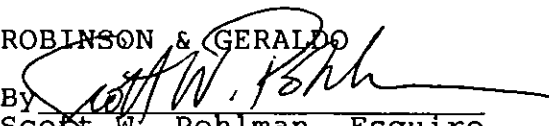
IN RE: :
Stacia H. Grove t/d/b/a : A-00114058
CENTRAL PENNSYLVANIA LIMOUSINE :
SERVICE (562 East Heatherfield :
Way, Red Lion, York County, Pa :
17356) - Persons in limousine :
service between points in the :
counties of York, Lancaster, :
Dauphin, and from points in the :
said territory to points in :
Pennsylvania and return :

I hereby certify that I served the foregoing "Answers to Interrogatories and Document Requests" in the above action, this day by hand delivery to:

SERVICE LIST

Benjamin C. Dunlap, Jr., Esquire
NAUMAN, SMITH, SHISSLER & HALL
200 North Third Street, 18th Floor
P.O. BOX 840
Harrisburg, PA 17108-0840

ROBINSON & GERALDO

By 
Scott W. Pohlman, Esquire
Attorney I.D. No. 78004
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110
(717) 232-8525

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: :
Stacia H. Grove t/d/b/a : A-00114058
CENTRAL PENNSYLVANIA LIMOUSINE :
SERVICE (562 East Heatherfield :
Way, Red Lion, York County, Pa :
17356) - Persons in limousine :
service between points in the :
counties of York, Lancaster, :
Dauphin, and from points in the :
said territory to points in :
Pennsylvania and return :

ANSWERS TO APPLICANT'S INTERROGATORIES AND DOCUMENT
REQUESTS DIRECTED TO KEYSTONE LIMOUSINE, INC.

1. Specify, with particularity, each and every fact in support of the contention contained in Keystone's Protest that "[e]ntry of the Applicant would endanger and impair the operations of existing carriers" in Dauphin, Lancaster and York counties and "would be contrary to the public interest."

The approval of an applicant which does not meet the need and fitness criteria as established by the Public Utility Commission is harmful to both the public and the limousine industry. The facts supporting the Protestant's protest will be based upon the applicants evidence and testimony.

2. Attach hereto any documents in support of your answer to Interrogatory No. 1 and explain how those documents relate to and support your answer.

NONE.

3. Describe with particularity and list each and every fact in support of the contention in Keystone's Protest that approval of Applicant's application "would create new unwarranted competition to the detriment of Protestant and other operators and ultimately the public, tending to deprive Protestant of customers and revenues, which are needed to maintain a safe transportation system."

A specific need for service has not been identified sufficient to support the applicant's requested authority. Therefore, the applicant would be taking customers and revenue from existing carriers who rely upon those customers for revenue. If a company does not have revenue they are not able to operate their service or maintain safe vehicles.

4. Attach hereto any documents in support of your answer to Interrogatory No. 3 and explain how those documents relate to and support your answer.

NONE .

5. Attach hereto a copy of Keystone's audited financial statements, if such exist, and if not, a copy of any compilation or review of the corporation's finances by a certified public accountant, a bookkeeping service provider or any other person, for the past three fiscal years.

The financial statements of the Protestant are privileged and proprietary information. The relevant financial records are available through the Public Utility Commission.

6. Attach hereto a copy of Protestant's corporate tax returns for the past three (3) fiscal years.

The financial statements of the Protestant are privileged and proprietary information. The relevant financial records are available through the Public Utility Commission.

7. Attach hereto a copy of Protestant's sales journal, also known as a cash receipts journal or a fare journal, for the past three (3) fiscal years.

All such reports are a matter of public record and available at the Public Utility Commission.

8. Attach hereto copies of any reports regarding Keystone's finances submitted to the Pennsylvania Public Utility Commission within the past three (3) reporting years, including, but not limited to, assessment reports submitted to the Commission pursuant to 52 Pa. Code §29.43.

All such reports are a matter of public record and available at the Public Utility Commission.

9. Attach hereto copies of Protestant's excise or gasoline tax reports for liquid fuel taxes made within the past three (3) reporting years.

All such reports are a matter of public record and available at the Public Utility Commission.

10. Attach hereto copies of all exhibits which Protestant intends to introduce at the hearing for this matter, and explain the purpose for which each exhibit will be introduced.

The Protestant intends to introduce a faxed memorandum from Gary Get~~ty~~ at York International to contradict the testimony of one of the Applicant's witnesses. A copy of said memorandum is attached as exhibit "A".

TO: Jim Salinger - White Rose Limousine
Fax - 852-0045

FROM: G. W. Getz

SUBJECT: York International Reservations

In an effort to reconfirm earlier conversations with regards to our reservation process, see that all reservation agents that handle reservations for York International receive a copy of this memo.

Effective immediately, all reservations for York International travel to and from ~~NYC~~ ^{ANY} airport must be requested by American Express Travel. No reservations should be accepted by any individual traveler and/or their secretaries."

The only exceptions to this would be the following individuals;

- | | |
|-----------------------|----------------------|
| Mr. Robert Pokelwaldt | Mr. Dean DuCray |
| Mr. Wayne Keunedy | Mr. Scott Boxer |
| Mr. James Bledsoe | Mr. Thomas Washburne |
| Mr. Victor McCloskey | Mr. Joseph Smith |
| Mrs. Jane Davis | Mr. Peter Spellar |
| Mr. Richard Hoover | |

begin 3 YORKIS

Administrative Assistants:

- | | | |
|---------------|-----------------|---------------|
| Linda Sites | Nancy Miller | Ramonda Wentz |
| Marge Howe | Linda Campbell | Penny Ness |
| Lynn Heltrick | Barbara Blymire | Margo Kohr |

Sincerely,

Gary Getz
Corporate Travel Manager

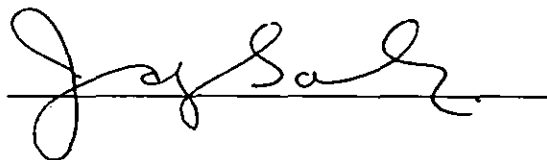
gary FAX - 851-1114

*JAC
771-16624*

Exhibit
A

VERIFICATION

I, James Salinger, the undersigned do hereby state that the statements set forth in the foregoing Answers to Interrogatories and Document Requests of the Applicant are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "James Salinger", is written over a horizontal line.

Dated: December 12, 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

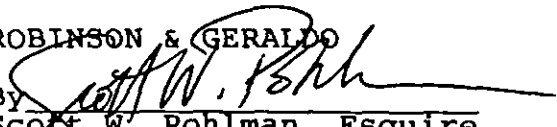
IN RE: :
Stacia H. Grove t/d/b/a : A-00114058
CENTRAL PENNSYLVANIA LIMOUSINE :
SERVICE (562 East Heatherfield :
Way, Red Lion, York County, Pa :
17356) - Persons in limousine :
service between points in the :
counties of York, Lancaster, :
Dauphin, and from points in the :
said territory to points in :
Pennsylvania and return :

I hereby certify that I served the foregoing "Answers to Interrogatories and Document Requests" in the above action, this day by hand delivery to:

SERVICE LIST

Benjamin C. Dunlap, Jr., Esquire
NAUMAN, SMITH, SHISSLER & HALL
200 North Third Street, 18th Floor
P.O. BOX 840
Harrisburg, PA 17108-0840

ROBINSON & GERALDO

By 
Scott W. Pohlman, Esquire
Attorney I.D. No. 78004
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110
(717) 232-8525

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: :
Stacia H. Grove t/d/b/a : A-00114058
CENTRAL PENNSYLVANIA LIMOUSINE :
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ANSWERS TO APPLICANT'S INTERROGATORIES AND DOCUMENT
REQUESTS DIRECTED TO SALGALS INC. t/d/b/a VILLA
LIMOUSINE SERVICE

1. Specify, with particularity, each and every fact in support of the contention contained in Salgals's Protest that "[e]ntry of the Applicant would endanger and impair the operations of existing carriers" in Dauphin and those portions of York counties in which Protestant operates and "would be contrary to the public interest."

The approval of an applicant which does not meet the need and fitness criteria as established by the Public Utility Commission is harmful to both the public and the limousine industry. The facts supporting the Protestant's protest will be based upon the applicants evidence and testimony.

2. Attach hereto any documents in support of your answer to Interrogatory No. 1 and explain how those documents relate to and support your answer.

NONE.

3. Describe with particularity and list each and every fact in support of the contention in Salgals's Protest that approval of Applicant's application "would create new unwarranted competition to the detriment of Protestant and other operators and ultimately the public, tending to deprive Protestant of customers and revenues, which are needed to maintain a safe transportation system."

A specific need for service has not been identified sufficient to support the applicant's requested authority. Therefore, the applicant would be taking customers and revenue from existing carriers who rely upon those customers for revenue. If a company does not have revenue they are not able to operate their service or maintain safe vehicles.

4. Attach hereto any documents in support of your answer to Interrogatory No. 3 and explain how those documents relate to and support your answer.

NONE.

5. Attach hereto a copy of Salgals's audited financial statements, if such exist, and if not, a copy of any compilation or review of the corporation's finances by a certified public accountant, a bookkeeping service provider or any other person, for the past three fiscal years.

The financial statements of the Protestant are privileged and proprietary information. The relevant financial records are available through the Public Utility Commission.

6. Attach hereto a copy of Protestant's corporate tax returns for the past three (3) fiscal years.

The financial statements of the Protestant are privileged and proprietary information. The relevant financial records are available through the Public Utility Commission.

7. Attach hereto a copy of Protestant's sales journal, also known as a cash receipts journal or a fare journal, for the past three (3) fiscal years.

All such reports are a matter of public record and available at the Public Utility Commission.

8. Attach hereto copies of any reports regarding Salgal's finances submitted to the Pennsylvania Public Utility Commission within the past three (3) reporting years, including, but not limited to, assessment reports submitted to the Commission pursuant to 52 Pa. Code §29.43.

All such reports are a matter of public record and available at the Public Utility Commission.

9. Attach hereto copies of Protestant's excise or gasoline tax reports for liquid fuel taxes made within the past three (3) reporting years.

All such reports are a matter of public record and available at the Public Utility Commission.

10. Attach hereto copies of all exhibits which Protestant intends to introduce at the hearing for this matter, and explain the purpose for which each exhibit will be introduced.

The Protestant intends to introduce a faxed memorandum from Gary Getty at York International to contradict the testimony of one of the Applicant's witnesses. A copy of said memorandum is attached as exhibit "A".

TO: Jim Salinger - White Rose Limousine
Fax - 852-0645

FROM: G. W. Getz

SUBJECT: York International Reservations

In an effort to reconfirm earlier conversations with regards to our reservation process, see that all reservation agents that handle reservations for York International receive a copy of this memo.

Effective immediately, all reservations for York International travel to and from ^{ANY} [redacted] airport must be requested by American Express Travel. No reservations should be accepted by any individual traveler and/or their secretaries."

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Mr. Wayne Kennedy	Mr. Scott Boxer
Mr. James Bledsoe	Mr. Thomas Washburne
Mr. Victor McCloskey	Mr. Joseph Smith
Mrs. Jane Davis	Mr. Peter Spellar
Mr. Richard Hoover	

Japan 3 YORKIS

Administrative Assistants:

Linda Sites	Nancy Miller	Ramonda Wentz
Marge Howe	Linda Campbell	Penny Ness
Lynn Helfrick	Barbara Blymire	Margo Kohr

Sincerely,

Gary

Gary Getz
Corporate Travel Manager

*gary
FAX - 851-1114*

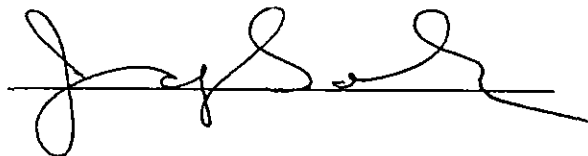
*50C
771-6624*

Exhibit

A

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Dated: December 12, 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

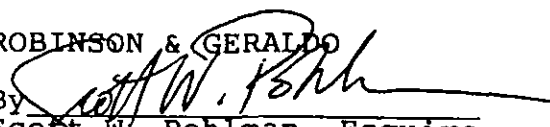
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P.O. BOX 840
Harrisburg, PA 17108-0840

ROBINSON & GERALDO

By 
Scott W. Pohlman, Esquire
Attorney I.D. No. 78004
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110
(717) 232-8525

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



ASSESSMENT REPORT
FORM MT-96

STATEMENT OF OPERATING REVENUES FOR GENERAL ASSESSMENT
OF COMMON CARRIER OF PROPERTY AND/OR PERSONS BY MOTOR VEHICLE

638460 TX PUC Certificate No. 104709
I.C.C. Permit No. MC 179259
UNIQUE LIMOUSINE SERVICE, INC. 1996 Operating Period JAN 1 to DEC 31
PO BOX 60402
HARRISBURG PA 171060402

THIS REPORT MUST BE FILED NOT LATER THAN MARCH 31, 1997.
IF NOT FILED, THE COMMISSION WILL ESTIMATE YOUR INTRASTATE OPERATING
REVENUES AND WILL BASE YOUR ASSESSMENT ON THE ESTIMATED TOTAL.
(Complete Back of this form.)

OPERATING REVENUES FOR CALENDAR YEAR 1996:
(Round to nearest dollar.)

Line	Amount
1. TOTAL GROSS OPERATING REVENUES earned from operating as a common carrier of property and/or persons	\$ 341,790
2. GROSS OPERATING REVENUES from INTERSTATE operations	\$ 169,989
3. TOTAL GROSS INTRASTATE operating revenue (line 1 minus line 2)	\$ 171,801
4. DEDUCTIONS based on exemptions itemized on back of form	\$
5. GROSS INTRASTATE REVENUE on which your assessment will be based \$ (line 3 minus line 4.) Indicate the method used to compute Intrastate Operating Revenue: Actual Records (X) estimated () other () . . . describe if other:	\$ 171,801

CERTIFICATION

Subscribed and sworn to before me
this 31st day of March 1997

Marie P. Zerance
(Signature)

OFFICIAL
SEAL

NOTARIAL SEAL
MARIE P. ZERANCE, Notary Public
(Official Seal of Berks County)
My Commission Expires April 29, 1998

April 29, 1998
(Date Commission Expires)

AFFIDAVIT

The information reported above is true
and correct.

[Signature]
(Signature of Individual or Officer) SS#

UNIQUE LIMOUSINE SERVICE INC 23-224505
(Trade or Corporate Name of Utility) Fed. ID#

New Address - if different from above

Telephone No. 717-233-4431

OPERATING REVENUES

Show all revenues obtained during 1996 from transportation services and for services incident thereto. Show the difference between INTRASTATE and INTERSTATE revenues and compile in Accordance with Section 510 of the Public Utility Code, with Generally Accepted Accounting principles and/or the Uniform System of Accounts.

(Round to nearest dollar amount.)

CLASSIFICATION	Intrastate Pennsylvania Revenues	Interstate Revenues	Total Revenues
TRANSPORTATION OF PASSENGERS	*****	*****	*****
Passenger Revenue:	*****	*****	*****
Scheduled route service			
Group and party service			
Call or demand service			
Limousine service	171,801	169,989	341,790
Airport transfer service			
Para-Transit service			
Other Revenue	*****	*****	*****
Baggage, mail, express, newspapers, etc.			
School Contracts			
Income from lease drivers			
Total Passenger Revenue	171,801	169,989	341,790
TRANSPORTATION OF PROPERTY	*****	*****	*****
Freight-Common Carrier-Intercity/Local			
Other Revenue (list)	*****	*****	*****
Total Transportation of Property Revenue			
Total Revenues (enter at lines 1,2 and 3 front page)	171,801	169,989	341,990
Senior citizens grants and Purchase of Service Agreements included in above totals			
EXEMPTIONS (list)	*****	*****	*****
TOTAL EXEMPTIONS (enter at line 4 front page)			

LAW OFFICES
NAUMAN, SMITH, SHISSLER & HALL

ORIGINAL

18TH FLOOR
200 NORTH THIRD STREET

P. O. Box 840

HARRISBURG, PENNSYLVANIA 17108-0840

TELEPHONE

(717) 236-3010

TELEFAX

(717) 234-1925

SPENCER G. NAUMAN, JR.
JOHN C. SULLIVAN
J. STEPHEN FEINOUR
CRAIG J. STAUDENMAIER
BENJAMIN C. DUNLAP, JR.
STEPHEN J. KEENE

COUNSEL
RALPH W. BOYLES, JR.
DAVID C. EATON
DIRECT E-MAIL ADDRESS
NSSH@REDROSE.NET

**DOCUMENT
FOLDER**

February 5, 1998

HAND DELIVERED

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

RE: **STACIA H. GROVE t/d/b/a Central Pennsylvania Limousine Service (562 East Heatherfield Way, Red Lion, York County, PA 17345) - persons in limousine service between points in the counties of York, Lancaster, and Dauphin, and from points in the said territory to points in Pennsylvania and return; A-00114058**

Dear Sir:

I enclose the original "Certificate of Mailing" which I neglected to include with my letter of February 4, 1998 in connection with the above matter. I would appreciate it if you would include this Certificate of Mailing with the original papers forwarded to you.

If you have any questions, please don't hesitate to contact me. I apologize for any inconvenience this may have caused.

Sincerely yours,

Judy A. Imes
Judy A. Imes
Secretary to

Benjamin C. Dunlap, Jr., Esquire

/jai
Enclosure

PROTHONOTARY'S OFFICE
PA. P. U. C.
98 FEB -5 PM 3:59
RECEIVED