



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

IN REPLY PLEASE
REFER TO OUR FILE

October 20, 1997

In Re: **A-00114058**

(See letter dated 08/28/97)

KJR

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: **Initial and Further Hearing**

Date: **Tuesday, December 16, 1997 - Initial Hearing**
Wednesday, December 17, 1997 - Further Hearing

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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OCT 21 1997

Attention: You may lose the case if you do not come to this hearing and present facts on the issues raised.

PROTHONOTARY'S OFFICE
97 OCT 21 AM 10:11

ORIGINAL

91 OCT 31 PM 2:34
PROTESTANT'S OFFICE

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

Pennsylvania Bulletin reference: Volume 27, No. 26, June 28, 1997, page 3127.

AMENDED PROTEST OF
SALGALS, INC. t/d/b/a VILLA LIMOUSINE SERVICE
PA. PUC A-00110608

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

SALGALS, INC. t/d/b/a VILLA LIMOUSINE SERVICE
P.O. BOX 60402
Harrisburg, PA 17106
(717) 774-5202

2. The name, address and telephone number of the Protestant's attorney is:

Scott W. Pohlman, Esq.
Robinson & Geraldo
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110

DOCUMENT
FOLDER

3. The Protestant possess authority to operate a limousine service in part of the territory requested by the Applicant. The Protestant possess authority at Pa. PUC A-00110608, which grants authority to operate in the County of York with restrictions, to the counties of Dauphin and others which are not in conflict. (See Exhibit "A"). The Protestant actively operates in accordance with its authority. The applicant has requested authority to operate in conflict with said authority.

4. The Protestant currently operates in accordance with its authority in said counties. There is no need for the additional proposed service. Entry of the applicant would endanger and impair the operations of existing carriers in that area, including this Protestant, and would be contrary to the public interest.

88:01114 4-ADH L6

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5. Approval is not necessary or proper for the service, accommodation, convenience or safety of the public.


6. Approval 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.

7. An established need does not exist. The request for new authority is not warranted in York County. The introduction of an additional limousine service will not create additional use by the public. The approval of Applicant's authority will only serve to endanger and impair the operation of existing certificate holders, including the Protestant.

8. Approval would be contrary to the accommodation, convenience, service and safety of the public.

9. Applicant has not demonstrated fitness to be granted a Certificate of Public Convenience by your Honorable Commission.

10. An amendment restricting authority to transport from points in the City of York, and the townships of York, Spring Garden, Manchester, West Manchester and Newberry, York County to points in the counties of Adams, Cumberland and Dauphin would protect applicants interest.

By 
Scott W. Pohlman, Esquire
ROBINSON & GERALDO
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110
Attorneys for the
Protestant

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

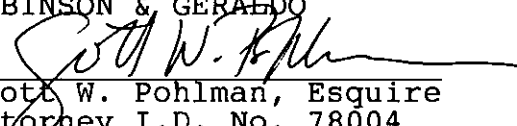
I hereby certify that I served the foregoing "Amended Protest" in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

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

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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

PROTHONOTARY'S OFFICE

97 OCT 31 PM 2:35

A-00110608 SALGALS, INC., t/d/b/a VILLA LIMOUSINE SERVICE (P.O. Box 60402, Harrisburg, Dauphin County, PA 17106), a corporation of the Commonwealth of Pennsylvania, persons, in limousine service, between points in York County, and from points in said county, to points in the counties of Adams, Cumberland, Dauphin, Lebanon and Perry, and vice versa; subject to the following condition: That no right, power or privilege is granted to transport from points in the city of York, and the townships of York, Spring Garden, Manchester, West Manchester and Newberry, York County, to points in the counties of Adams, Cumberland and Dauphin; which is to be a transfer of the right authorized under the certificate issued at A-00105154 to Villa Limo Service, Inc., a corporation of the Commonwealth of Pennsylvania, subject to the same limitations and conditions.

Exhibit

"A"

ORIGINAL

PROTECTION DIVISION'S OFFICE
27 OCT 31 PM 2:35

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

Pennsylvania Bulletin reference: Volume 27, No. 26, June 28, 1997, page 3127.

AMENDED PROTEST OF
KEYSTONE LIMOUSINE, INC.
PA. PUC A-00110279

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

KEYSTONE LIMOUSINE, INC.
988 Stony Battery Road
Lancaster, PA 17601
(717) 653-8143

2. The name, address and telephone number of the Protestant's attorney is:

Scott W. Pohlman, Esq.
Robinson & Gerald
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110

DOCUMENT
FOLDER

3. The Protestant possess authority to operate a limousine service in part of the territory requested by the Applicant. The Protestant possess authority at Pa. PUC A-00110279, which grants authority to transport, as a common carrier, persons in the counties of York, Lancaster and Dauphin and others which are not in conflict with the present application for authority. (See Exhibit "A")

4. The Protestant currently operates in Lancaster, York and Dauphin Counties. There is no need for the additional proposed service. Entry of the applicant would endanger and impair the operations of existing carriers in that area, including this Protestant, and would be contrary to the public interest.

5. Approval is not necessary or proper for the service, accommodation, convenience or safety of the public

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6. Approval 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.

7. An established need does not exist. The request for new authority is not warranted in Lancaster, Dauphin or York County. The introduction of an additional limousine service will not create additional use by the public. The approval of Applicant's authority will only serve to endanger and impair the operation of existing certificate holders, including the Protestant.

8. Approval would be contrary to the accommodation, convenience, service and safety of the public.

9. Applicant has not demonstrated fitness to be granted a Certificate of Public Convenience by your Honorable Commission.

10. There is no amendment which would protect Keystone Limousine Inc.'s interest.

By 
Scott W. Pohlman, Esquire
ROBINSON & GERALDO
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110
Attorneys for the
Protestant

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

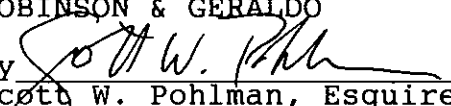
I hereby certify that I served the foregoing "Amended Protest" in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

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

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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

PROTICARY'S OFFICE

57 OCT 31 PM 2:35

KEYSTONE LIMOUSINE, INC.

RATES AND RULES
GOVERNING THE
TRANSPORTATION OF

To transport, as a common carrier, persons in limousine service, between points in the counties of Adams, Cumberland, Dauphin, Franklin, Lancaster, Lebanon and York, and from points in said counties to points in Pennsylvania, and Return.

ISSUED: DECEMBER 4, 1996

EFFECTIVE: DECEMBER 5, 1996

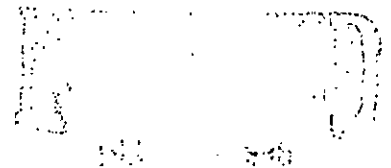
ISSUED UNDER AUTHORITY OF PA. CODE, TITLE 52, SECTION 23,42

BY: NANCY J. REYMER, PRESIDENT
KEYSTONE LIMOUSINE, INC.
304 EAST MAIN STREET
MOUNT JOY, PENNSYLVANIA 17552

(717) 653-8141

Exhibit

"A"



Trans. Authority

COPY

A-00110279, Folder 2 KEYSTONE LIMOUSINE, INC. (228 East Main Street, Mount Joy, Lancaster County, PA 17552), a corporation of the Commonwealth of Pennsylvania - persons, in limousine service, between points in the counties of Adams, Cumberland, Dauphin, Franklin, Lancaster, Lebanon and York, and from points in said counties to points in Pennsylvania, and return. Attorney: Scott D. Albert, 50 East Main Street, Mount Joy, PA 17552.

PENDING
APPROVAL

KEYSTONE LIMOUSINE, INC.

COPY

RATES AND RULES
GOVERNING THE
TRANSPORTATION OF

To transport, as a common carrier, persons in airport transfer service, from points in the counties of Lancaster and York, to the following airports: Philadelphia International Airport, in the city and county of Philadelphia, and the township of Tinicum, Delaware County; Harrisburg International Airport, in the township of Lower Swatara, dauphin County; Lancaster Municipal Airport, in the township of Manheim, Lancaster County; and the Reading Municipal Airport in the township of Bern, Berks County.

Issued: January 8, 1993

Effective: January 9, 1993

Issued under authority of Pa. Code, title 52, Section 23.42

By: Ronald E. Stough Vice President
Keystone Limousine, Inc.
228 East Main Street
Mount Joy, Pennsylvania 17552
(717) 653-8143

COPY

A-00110279 KEYSTONE LIMOUSINE, INC. (228 East Main Street, Mt. Joy, Lancaster County, PA 17552) a corporation of the Commonwealth of Pennsylvania - persons in airport transfer service from points in the county of Lancaster and the county of York, to the following airports: Philadelphia International Airport, in the city and county of Philadelphia, and the township of Tinicum, Delaware County; Harrisburg International Airport, in the township of Lower Swatara, Dauphin County; Lancaster Municipal Airport in the township of Manheim, Lancaster County; and the Reading Municipal Airport in the township of Bern, Berks County. Attorney: Scott E. Albert, 50 East Main Street, Mt. Joy, PA 17552.

ORIGINAL

PROTICOM PUBLIC UTILITY'S
57 OCT 21 PM 2:55

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

Pennsylvania Bulletin reference: Volume 27, No. 26, June 28, 1997, page 3127.

AMENDED PROTEST OF
UNIQUE LIMOUSINE SERVICE, INC.
PA. PUC A-00104709

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

Unique Limousine Service, Inc.
1301 North Cameron Street
Harrisburg, PA 17103
(717) 233-4419

2. The name, address and telephone number of the Protestant's attorney is:

Scott W. Pohlman, Esq.
Robinson & Gerald
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110

DOCUMENT
FOLDER

3. The Protestant possess authority to operate a limousine service in part of the territory requested by the Applicant. The Protestant possess authority at Pa. PUC A-00104709, which grants authority to operate between points in the counties of Dauphin and Cumberland, and from points in said counties, to points in Pennsylvania, and vice versa. (See Exhibit "A"). The Protestant actively operates in both counties. The county of Dauphin has been requested as a county of operation by the applicant.

4. The Protestant currently operates in Dauphin and Cumberland County. There is no need for the additional proposed service. Entry of the applicant would endanger and impair the operations of existing carriers in that area, including this Protestant, and would be contrary to the public interest.

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5. Approval is not necessary or proper for the service, accommodation, convenience or safety of the public.

6. Approval 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.

7. An established need does not exist. The request for new authority is not warranted in Dauphin county. The introduction of an additional limousine service will not create additional use by the public. The approval of Applicant's authority will only serve to endanger and impair the operation of existing certificate holders, including the Protestant.

8. Approval would be contrary to the accommodation, convenience, service and safety of the public.

9. Applicant has not demonstrated fitness to be granted a Certificate of Public Convenience by your Honorable Commission.

10. A restriction or amendment in the applicant's requested authority to operation in the counties of York and Lancaster would protect the applicants interest in Dauphin county.

By _____
Scott W. Pohlman, Esquire
ROBINSON & GERALDO
Attorneys for the

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

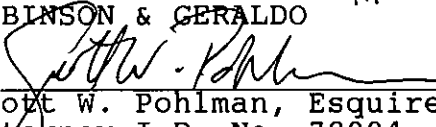
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SERVICE LIST

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

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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

PROTHONOTARY'S OFFICE

97 OCT 31 PM 2:35

A-00104709 UNIQUE LIMOUSINE SERVICE, INC. (3737 North Sixth Street, Harrisburg, Pennsylvania, 17110), a corporation of the Commonwealth of Pennsylvania - persons, in luxury limousine service, in vehicles with a seating capacity of ten (10) passengers or less, excluding the driver, between points in the counties of Dauphin and Cumberland, and from points in said counties, to points in Pennsylvania, and vice versa.

Exhibit

"A"

ORIGINAL

PROTODIO HARRY'S OFFICE
31 OCT 31 PM 2:33

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

Pennsylvania Bulletin reference: Volume 27, No. 26, June 28, 1997, page 3127.

AMENDED PROTEST OF
WHITE ROSE LIMOUSINE INC.
PA. PUC A-00114058

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

White Rose Limousine Inc.
1327 North Duke Street
York, PA 17404
(717) 845-8223

2. The name, address and telephone number of the Protestant's attorney is:

Scott W. Pohlman, Esq.
Robinson & Geraldo
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110

DOCKETED
NOV 24 1997

3. The Protestant possess authority to operate a limousine service in part of the territory requested by the Applicant. The Protestant possess authority at Pa. PUC A-00114058, which grants authority to operate between points in the counties of Dauphin and York and others, subject to certain conditions. (See Exhibit "A"). The Protestant actively operates in accordance with its authority. The counties of Dauphin and York have been requested as a counties of operation by the applicant.

4. The Protestant currently operates in Dauphin and York Counties. There is no need for the additional proposed service. Entry of the applicant would endanger and impair the operations of existing carriers in that area, including this Protestant, and would be contrary to the public interest.

57 NOV 4 - AM 10:33
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5. Approval is not necessary or proper for the service, accommodation, convenience or safety of the public.


6. Approval 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.

7. An established need does not exist. The request for new authority is not warranted in Dauphin or York County. The introduction of an additional limousine service will not create additional use by the public. The approval of Applicant's authority will only serve to endanger and impair the operation of existing certificate holders, including the Protestant.

8. Approval would be contrary to the accommodation, convenience, service and safety of the public.

9. Applicant has not demonstrated fitness to be granted a Certificate of Public Convenience by your Honorable Commission.

10. A restriction or amendment in the Applicant's requested authority restricting operations to operations in territories where the Protestant is not permitted to operate, would protect the Protestant's interest.

By 
Scott W. Pohlman, Esquire
ROBINSON & GERALDO
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110
Attorneys for the
Protestant

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.


I hereby certify that I served the foregoing "Amended Protest" in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed 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

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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

ROTHHOFF, U.S. DEPT. OF JUSTICE

97 OCT 31 PM 2:33

A-00114058 WHITE ROSE LIMOUSINE INC., (1327 North Duke Street, York, PA 17404) a corporation of the Commonwealth of Pennsylvania - persons, in limousine service, between points in the counties of Adams, Cumberland, Dauphin, Lebanon, and York, and from points in said counties, to points in Pennsylvania, and return; subject to the following conditions: That no right, power or privilege is granted to provide service from the Harrisburg International Airport in the township of Lower Swatara, Dauphin County, to the township of Perry, Dauphin County, or to originate service in the borough of Camp Hill, Cumberland Country or the city of Harrisburg, Dauphin County; which is to be a transfer of the right authorized under the certificate issued at A-00114058 to White Rose Limousine Service, Inc., a corporation of the Commonwealth of Pennsylvania, subject to the same limitations and conditions.

Exhibit

"A"

ORIGINAL

PROCEEDINGS OFFICE
97 OCT 31 PM 2:34

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

Pennsylvania Bulletin reference: Volume 27, No. 26, June 28, 1997, page 3127.

AMENDED PROTEST OF
SUPERIOR LIMOUSINE SERVICE
PA. PUC A-00110383

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

Superior Transportation Services, Inc
t/a Superior Limousine Service
P.O. Box 122
Hershey, PA 17033
(717) 939-5560

2. The name, address and telephone number of the Protestant's attorney is:

Scott W. Pohlman, Esq.
Robinson & Geraldo
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110

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3. The Protestant Superior Transportation Service is owned by Raymond Bensch. Mr. Bensch has incorporated and is transferring ownership to Superior Transportation Services Inc. a Pennsylvania incorporation owned by Raymond Bensch and Jan Bensch his wife. The outcome of this application will have a direct and immediate impact upon Superior Transportation Service.

4. The Protestant possess authority to operate a limousine service in part of the territory requested by the Applicant. The Protestant possess authority at Pa. PUC A-00110383 and Pa. PUC A-00110383, Folder 1, Amendment A, which grants authority to operate in the county of Dauphin, with restrictions. (See Exhibit "A"). The Protestant actively operates in accordance with its authority. The county of Dauphin has been requested as a county of operation by the applicant.

88:0114 4-NOV 97

DOCUMENT
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5. The Protestant currently operates in Dauphin County. There is no need for the additional proposed service. Entry of the applicant would endanger and impair the operations of existing carriers in that area, including this Protestant, and would be contrary to the public interest.

6. Approval is not necessary or proper for the service, accommodation, convenience or safety of the public.


7. Approval 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.

8. An established need does not exist. The request for new authority is not warranted in Dauphin county. The introduction of an additional limousine service will not create additional use by the public. The approval of Applicant's authority will only serve to endanger and impair the operation of existing certificate holders, including the Protestant.

9. Approval would be contrary to the accommodation, convenience, service and safety of the public.

10. Applicant has not demonstrated fitness to be granted a Certificate of Public Convenience by your Honorable Commission.

11. A restriction or amendment in the applicant's requested authority to operation in the counties of York and Lancaster would protect the applicants interest in Dauphin county.

By 
Scott W. Pohlman, Esquire
ROBINSON & GERALDO
4407 North Front Street
P.O. Box 5320
Harrisburg, PA 17110
Attorneys for the
Protestant

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

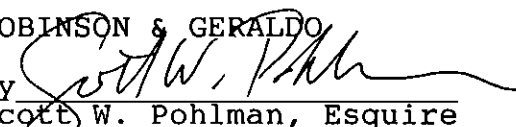
I hereby certify that I served the foregoing "Amended Protest" in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

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

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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

PROTECTOR GENERAL'S OFFICE

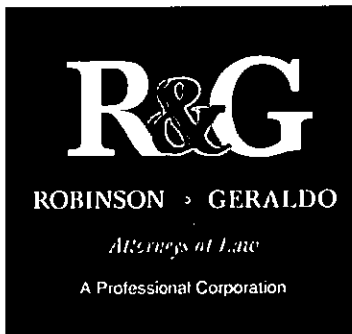
97 OCT 31 PM 2:34

A-00110383 RAYMOND D. BENSCH, t/d/b/a SUPERIOR LIMOUSINE SERVICE OF HARRISBURG (300 Mushroom Hill Road, Swatara, Dauphin County, PA 17111) - persons in limousine service, between points in the county of Dauphin, and from points in said county, to points in Pennsylvania, and return; subject to the following condition: That no right, power or privilege is granted to provide service to or from the Harrisburg International Airport located in Lower Swatara Township, Dauphin County: which is to be a transfer of the rights authorized under the certificate issued at A-00108939 to Raymond D. and Ronald D. Bensch, Copartners, t/d/b/a Superior Limousine Service of Harrisburg, subject to the same limitations and conditions.

Exhibit

"A"

A-00110383, Folder 1, Am-A RAYMOND D. BENSCH, t/d/b/a SUPERIOR LIMOUSINE SERVICE OF HARRISBURG (300 Mushroom Hill Road, Harrisburg, Dauphin County, PA 17111) - persons in limousine service between points in the county of Dauphin, and from points in said county to points in Pennsylvania, and return; subject to the following condition: That no right, power or privilege is granted to provide service to or from the Harrisburg International Airport in Lower Swatara Township, Dauphin County: SO AS TO PERMIT the transportation of persons in limousine service, between points in the counties of Adams and Perry, and the boroughs of Gratz and Elizabethville, and the townships of East Hanover and West Hanover, Dauphin County to points in Pennsylvania and return; which is to be a transfer of the right authorized under the certificate issued at A-00109491 to Elmer Angelo Soprano, t/d/b/a Elmer Soprano Limousine Service, subject to the same limitations and conditions.



97 NOV 14 AM 8:54
RECEIVED
PROTHONOTARY'S OFFICE

November 12, 1997

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

RE: STACIA H. GROVE t/d/b/a Central Pennsylvania Limousine Service; A-00114058

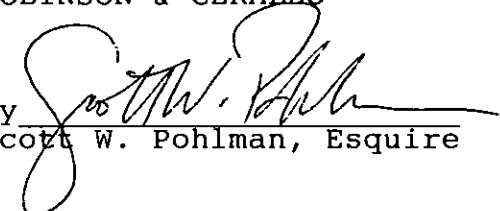
Dear Mr. McNulty:

I have enclosed three copies of Interrogatories and Document Requests of Superior Limousine Service, Keystone Limousine, Inc., Unique Limousine Service, Inc., Salgals, Inc. t/d/b/a Villa Limousine Service and White Rose Limousine Inc. In accordance with the certificate of Service I have mailed a copy to all parties of record.

Please contact our office if you have any questions.

Sincerely yours,

ROBINSON & GERALDO

By 
Scott W. Pohlman, Esquire

DOCUMENT
FOLDER

SWP:
Enclosures

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PROTHONOTARY'S OFFICE

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

I hereby certify that I served the foregoing "Interrogatories and Document Requests" in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed 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

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

DOCUMENT
FOLDER

DOCKETED
NOV 17 1997

ROBINSON & GERALDO

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

ORIGINAL

RECEIVED
91 NOV 25 PM 3:53
U.S. DISTRICT COURT
PROTHONOTARY'S OFFICE

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

IN RE: A-00114058. 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.

ANSWER TO MOTION TO DISMISS

AND NOW comes the Protestant Superior Transportation Services Inc. t/a Superior Transportation Services, by and through its attorney Scott W. Pohlman, Esquire and ROBINSON & GERALDO and answers the Applicant's Motion to Dismiss, based upon the following:

1. Paragraph 1 of the Applicant's motion is admitted.
2. Paragraph 2 of the Applicant's motion is admitted.
3. Paragraph 3 of the Applicant's motion is admitted.

4. Protestant Superior Transportation Services, Inc. is owned by Jan Bensch and Raymond Bensch, Raymond Bensch is the registered owner of Superior Transportation Services of Harrisburg who holds a Certificate of Public Convenience in the service area of the Applicant's requested territory and the authority is being transferred to Superior Transportation Services, Inc. A copy of the Articles of Incorporation is Attached as Exhibit "A".

5. Paragraph 5 is denied, all preliminary motions shall be raised at the same time according to 52 PA Code Section 5.101(b). A motion to dismiss for standing was not filed with the first preliminary motion to dismiss or strike and therefore should be denied.

6. Paragraph 6 is denied, Superior Transportation Services, Inc. t/a Superior Transportation Services should be permitted to file the amended protest. Superior Transportation Services, Inc. is representing the interest of Raymond Bensch t/a Superior Transportation Services of Harrisburg a holder of a valid Certificate of Public Convenience in the requested territory of the Applicant.

DOCKETED

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FOLDER

WHEREFORE, Superior Transportation Services, Inc. t/a Superior Limousine Service prays that the Motion of the Applicant to Dismiss the Amended Protest of Superior Transportation Services t/a Superior Transportation Service, be denied.

Respectfully submitted,

ROBINSON & GERALDO

By 

Scott W. Pohlman, Esquire

ROBINSON & GERALDO

4407 N. Front St.

P.O. Box 5320

Harrisburg, PA 17110

(717) 232-8525

Attorney ID # 78004

Attorney for the Protestant

Dated: _____

11/25/97

9745-1671

- 7. Additional provisions of the articles, if any, attach an 8 1/2 x 11 sheet.
- 8. **Statutory close corporation only:** Neither the corporation nor any shareholder shall make an offering of any of its shares of any class that would constitute a "public offering" within the meaning of the Securities Act of 1933 (15 U.S.C. § 77a et seq.).
- 9. **Cooperative corporations only:** (Complete and strike out inapplicable term) The common bond of membership among its members/shareholders is: _____

IN TESTIMONY WHEREOF, the incorporator(s) has (have) signed these Articles of Incorporation this 11th day of June, 19 97.

Raymond D. Beaulieu
(Signature)

T. O. Beaulieu
(Signature)

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 :

RECORDED
97 NOV 25 PM 3:55
PROthonotary's OFFICE

CERTIFICATE OF SERVICE


I hereby certify that I served the foregoing "Answer to the Motion to Dismiss the Amended Protest of Superior Limousine Service" in the above action, on November 25, 1997, by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania addressed to:

SERVICE LIST

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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
Post Office Box 5320
Harrisburg, Pennsylvania 17110
(717) 232-8525

ORIGINAL

LAW OFFICES
NAUMAN, SMITH, SHISLER & HALL

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

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

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

**DOCUMENT
FOLDER**

December 5, 1997

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 to Strike the Answer of Superior Transportation Services, Inc., t/a Superior Limousine Services to Motion to Dismiss for filing in the above matter. In accordance with the accompanying Certificate of Service we have provided copies of the Motion to Strike to all active parties of record.

Sincerely yours,

Judy A. Imes
Judy A. Imes
Secretary to

Benjamin C. Dunlap, Jr., Esquire

/jai

Enclosures

cc: All Parties of Record
Stacia H. Grove

97 DEC -5 PM 4: 17
PROTHONOTARY'S OFFICE

88

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

RECORDED
97 DEC -5 PM 4: 17
PUBLIC
PROTHONOTARY'S OFFICE

DOCUMENT
FOLDER

**MOTION TO STRIKE THE ANSWER OF
SUPERIOR TRANSPORTATION SERVICES, INC.,
t/a SUPERIOR LIMOUSINE SERVICES TO
MOTION TO DISMISS**

DOCKETED
DEC 16 1997

Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine Service ("Grove") by her attorneys, NAUMAN, SMITH, SHISSLER & HALL, requests that the Pennsylvania Public Utility Commission ("Commission") strike the Answer of Protestant Superior Transportation Services, Inc., t/a Superior Limousine Services ("Superior") to Grove's Motion to Dismiss based upon the following:

1. Grove filed her Motion to Dismiss the Amended Protest of Superior Limousine Service for lack of standing on November 10, 1997.

2. The aforementioned Motion to Dismiss was also served on Protestant Superior and its attorney by first class mail the same day.

3. Pursuant to 52 Pa. Code §3.381(c)(3) and 52 Pa. Code §5.101(d), an answer to a motion to dismiss must be filed within ten (10) days of the date of service of the Motion.

4. Superior's Answer to Grove's Motion to Dismiss was not filed with the Commission until November 25, 1997, which is 14 days following the date of service of Grove's Motion to Dismiss, and therefore should be stricken.

5. In the event that Superior's entire Answer to Grove's Motion to Dismiss is not stricken due to its late filing, paragraph 5 of Superior's Answer should be stricken, in that Superior states that Grove should not have the opportunity to raise any objection to Superior's Amended Protest which had not been raised against Superior's initial protest. Superior's stance in this regard would deprive Grove of her right to raise any and all objections to the new pleading, i.e. the amended protest,

which is contrary to the Commission rules regarding answers to protests and equity.

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: December 5, 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, :
and Dauphin, and from points in the :
said territory to points in :
Pennsylvania and return :


RECEIVED
97 DEC -5 PM 4: 17
P.A.U.C.
PROTHONOTARY'S OFFICE

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **Motion to Strike the Answer of Superior Transportation Services, Inc., t/a Superior Limousine Services to Motion to Dismiss**, in the above action, this day by first class mail, postage prepaid, addressed to:

SERVICE LIST

Scott Pohlman, Esquire
Robinson & Geraldo
P. O. Box 5320
Harrisburg, PA 17110



Judy A. Imes, Secretary to
Benjamin C. Dunlap, Jr., Esquire

Dated: December 5, 1997