

JOHN W. PELINO
MARTIN R. LENTZ
BARRY E. BRESSLER
RICHARD W. KESSLER
SALVATORE M. DEBUNDA
RICHARD N. WEINER
KENNETH J. LEVIN
LOUIS J. SINATRA
ROBERT A. HANAMIRIAN
JEANNE SCHUBERT BARNUM**
HOWARD A. ROSENTHAL
VICTORIA PAGE-WOOTEN
GARY D. FRY*
CRISTINA G. CAVALIERI
KAREN A. FAHRNER
EDWARD L. CIEMNIECKI*
DEBRA CSIK KERN*
DOROTHY FECHT LUNTEY*
PAUL R. FITZMAURICE*
JILL M. BELLAK
PATRICK J. DORAN*
RONALD L. DAUGHERTY*
JAMES E. MILLER*
KEVIN J. KILDUFF
MICHAEL O. ALLEN
ERIN B. SANTAMARIA*
JAMES C. SHAH*

* ALSO MEMBER NJ BAR
DIRECT DIAL (215)

LAW OFFICES
PELINO & LENTZ
A PROFESSIONAL CORPORATION
ONE LIBERTY PLACE
THIRTY-SECOND FLOOR
1650 MARKET STREET
PHILADELPHIA, PA 19103-7393
(215) 665-1540
FAX (215) 665-1536

OF COUNSEL
ALBERT W. SCHIFFRIN
ELLIOT UNTERBERGER
C. RICHARD HORROW
HENRY W. MAXMIN
(1976-1990)

March 18, 1998

RECEIVED

MAR 18 1998

PELINO & LENTZ
30 SOUTH HADDON AVENUE
HADDONFIELD, NJ 08033-9975
(609) 428-9484
*NJ MANAGING ATTORNEY

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

Re: **Application of Bayshore Transportation System, Inc.**
Docket No.: A-114277, F.2

Dear Mr. McNulty:

Enclosed please find the original and two (2) copies of the Verified Statement of Applicant, Bayshore Transportation System, Inc., which is being filed in the above-captioned proceeding.

Also enclosed are the originals and two (2) copies of eight Verified Statements submitted in support of Bayshore's Application.

If any further information is required in connection with this matter, please contact the undersigned.

Very truly yours,

Edward L. Ciemniecki

ELC/slw
Enclosures
cc: Mr. Matt Larmore (w/o enc.)



9045 111 4342103

Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF : DOCKET NO.
: :
BAYSHORE TRANSPORTATION :
SYSTEM, INC. : 114277, F.2

RECEIVED

MAR 18 1998

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

VERIFIED STATEMENT OF
LINDA L. PIAZZA, PRESIDENT

I. LEGAL NAME AND DOMICILE OF APPLICANT

Applicant, Bayshore Transportation System, Inc. ("Bayshore"), is a Delaware corporation with its primary place of business at 901 Dawson Drive, Newark, Delaware 19713. Bayshore registered to do business in Pennsylvania as a foreign corporation on June 18, 1997.

II. AFFILIATION WITH OTHER CARRIERS

Applicant is an authorized agent of Allied Van Lines.

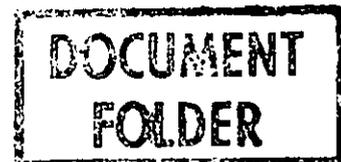
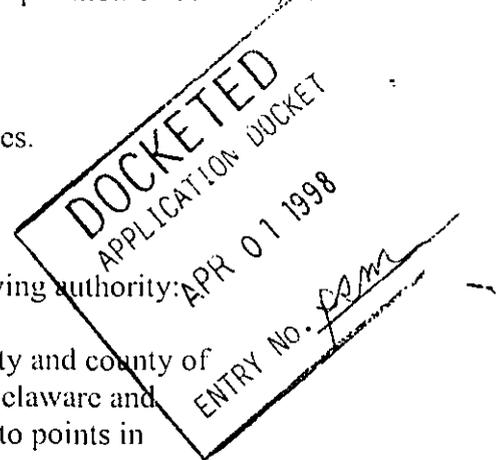
III. AUTHORITY SOUGHT

As initially filed, this application sought the following authority:

Household goods, in use, between points in the city and county of Philadelphia and the counties of Bucks, Chester, Delaware and Montgomery, and from points in the said counties to points in Pennsylvania.

Protests to the application were filed by Clemmer Moving & Storage, Inc., Shelly Moving & Storage, Inc. and Morgan Moving & Storage, Ltd. All protests were withdrawn when Bayshore restrictively amended its application so that it now seeks the following:

Household goods, in use, between points in the counties of Chester and Delaware, and from points in said counties to points in Pennsylvania.



IV. GENERAL SCOPE OF CURRENTLY AUTHORIZED OPERATIONS

Applicant currently transports household goods on an interstate basis pursuant to its agency relationship with Allied Van Lines. Intrastate household goods operations are also conducted in Delaware and Virginia. Bayshore was recently granted a Certificate of Public Convenience by this Commission authorizing it to transport property, except household goods, between points in Pennsylvania and is in the process of initiating operations pursuant to this grant of authority.

V. DUPLICATING AUTHORITY TO RESULT FROM A GRANT OF THE REQUESTED AUTHORITY

No duplicating authority will result from a grant of the authority requested in this proceeding.

VI. DESCRIPTION OF TERMINAL FACILITIES AND COMMUNICATIONS NETWORK

Bayshore currently maintains terminal facilities in Newark, Delaware and Woodbridge, Virginia.

Bayshore's Newark, Delaware facility is located at 901 Dawson Drive, Delaware Industrial Park, Newark, Delaware 19713. This facility houses Bayshore's corporate offices and is the location from which vehicles to be utilized in the proposed service will be dispatched. The Newark facility has approximately 55,000 square feet of warehouse space. Bayshore's Virginia facility, situated at 14920 Farm Creek Drive, Woodbridge, Virginia 22191, is somewhat larger than the Delaware location, with warehouse space encompassing approximately 75,000 square feet.

Communications between Applicant and its drivers will be accomplished by regular telephone service.

VII. DESCRIPTION OF APPLICANT'S EQUIPMENT

Attached hereto as Appendix 1 is a description of the equipment to be utilized by Bayshore to provide the proposed transportation. Applicant's vehicles are specially equipped to provide household goods transportation, including such features as power lift gates and air-ride suspensions.

VIII. DESCRIPTION OF SAFETY PROGRAM

Bayshore is dedicated to providing service in the safest manner possible. In this regard, Applicant has developed a strict safety program which focuses on both driver performance and vehicle maintenance.

The first part of the safety program focuses on drivers. New applicants are carefully screened and tested in accordance with all applicable U.S. DOT regulations. In particular, driver applicants must pass a road test, drug test, and a Department of Motor Vehicle ("DMV") check on the status of their operator's license before being hired. Potential employees must demonstrate their knowledge of safety requirements and the specialized skills necessary for household goods moving service in order to obtain employment with Applicant.

Driver training also includes continuing education and supervision. Drivers are subject to random drug testing. Also, a DMV check is made annually on each driver. Each driver's performance is continually monitored to ensure compliance with all safety procedures.

The second aspect of the safety program relates to vehicles and other equipment. Equipment is maintained to ensure that it operates in peak condition. Drivers are required to

carefully inspect their vehicles daily. Any problems found are repaired before the vehicle is returned to service. All vehicles are maintained under a scheduled preventive maintenance program which meets or exceeds all applicable government regulations or manufacturer's requirements.

IX. SERVICE CURRENTLY PROVIDED

As noted above, Applicant is currently providing household goods transportation services in interstate commerce as an agent of Allied Van Lines. The service presently provided by Applicant is similar in nature to that proposed herein and is described in detail in Section X below.

X. DESCRIPTION OF PROPOSED SERVICE

Applicant intends to provide traditional household goods transportation services from origins throughout Chester and Delaware Counties.

Applicant will, upon request, assist the customer in boxing or crating the items to be transported. Upon arrival at destination, the household goods will be set up at locations requested by the customer. Applicant's employees have been trained as to the proper handling and transporting of household goods and Applicant is proud of its claims record.

As noted previously, Applicant will supply motor vehicle equipment that is specially designed for the loading, transporting and unloading of household goods.

Applicant is experienced in providing household goods transportation and is confident of its ability to service the territory sought by this application.

XI. FINANCIAL DATA

Attached hereto is Bayshore's more recent Balance Sheet (Appendix 2) and Income Statement (Appendix 3). Bayshore submits that it possesses the financial resources necessary to provide the service proposed by the instant application.

XII. OTHER INFORMATION DEEMED PERTINENT

As noted, Applicant is experienced in providing service of the nature proposed herein and will bring that experience to bear in expanding its operations to include Pennsylvania intrastate service.

Filed concurrently with this Verified Statement are eight Supporting Shipper Statements submitted by shippers interested in utilizing the service proposed by Bayshore. Included among Bayshore's supporting shippers are such major companies as Shared Medical Systems Corporation (over 5,000 employees), Arco Chemical Company (2,000 employees), DuPont Company Nemours (Fortune 100 company), Chemical Leaman Corporation (2,000 employees) and Pierce Leahy (2,300 employees) who have stated their intention to use Applicant's service to, from and between points in the application territory. Bayshore submits that the evidence presented by its supporting shippers, as detailed in the Verified Statements, amply supports the approval of this application in its entirety.

VERIFICATION OF STATEMENTS

I, Linda Piazza, verify that I am the President of Bayshore Transportation System, Inc., that I am authorized to submit this Verified Statement on its behalf and that the facts set forth herein are true and correct to the best of my 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.

Date: _____

3/9/98



Linda Piazza, President
Bayshore Transportation System, Inc.

APPENDIX "1"

	UNIT	SIZE	PURPOSE / USE
1	1994 Dodge Pick-up	Standard Pick-up	Multi-purpose
2	1993 Ford 350 Pack Van	16' High Cube Pack Van	Packing
3	1988 Ford Pack Van	Econoline Pack Van	Packing
4	1984 Ford Pack Van	16' High Cube Pack Van	Packing
5	1984 GMC Pack Van	16' High Cube Pack Van	Packing
6	1995 Ford Pack Van	16' High Cube Pack Van	Packing
7	1992 Ford E350 Pack Van	16' High Cube Pack Van	Packing
8	1987 Mack Straight Truck	22' Straight Truck	Packing/Moving
9	1989 International Straight Truck	26' Straight Truck	Moving
10	1988 International Straight Truck	26' Straight Truck	Moving
11	1988 International Straight Truck	26' Straight Truck	Moving
12	1990 GMC Straight Truck	26' Straight Truck	Moving
13	1988 Mercedes Straight Truck	26' Straight Truck	Moving / Vault Delivery
14	1996 International Straight Truck	26' Straight Truck	Moving / Vault Delivery
15	1990 International Straight Truck	26' Straight Truck	Moving / Vault Delivery
16	1986 Kentucky Trailer	48' Trailer	Moving
17	1985 Kentucky Trailer	48' Trailer	Moving
18	1989 Kentucky Trailer	48' Trailer	Moving
19	1991 Kentucky Trailer	48' Trailer	Moving
20	1989 Kentucky Trailer	48' Trailer	Moving
21	1990 Kentucky Trailer	48' Trailer	Moving
22	1994 Kentucky Trailer	48' Trailer	Moving
23	1988 Kentucky Trailer	48' Trailer	Moving
24	1991 Kentucky Trailer	48' Trailer	Moving
25	1993 Kentucky Trailer	48' Trailer	Moving
26	1990 Kentucky Trailer	48' Trailer	Moving
27	1980 Kentucky Trailer	45' Trailer	Trash Trailer
28	1985 Kentucky Trailer	45' Trailer	Moving
29	1992 Kentucky Trailer	48' Trailer	Moving
30	1988 Matlock Trailer	46' Trailer (liftgate)	Moving / Special Prod.
31	1988 Kentucky Trailer	48' Trailer	Moving
32	1997 Kentucky Trailer	50' Trailer	Moving
33	1995 Kentucky Trailer	50' Trailer	Moving
34	1996 Kentucky Trailer	50' Trailer	Moving
35	1997 Kentucky Trailer	50' Trailer	Moving
36	1984 Freightliner Tractor	Cab-over	Power Unit
37	1987 Kenworth Tractor	Cab-over	Power Unit
38	1977 International Tractor	Cab-over (single axle)	Power Unit
39	1993 Freightliner Tractor	Cab-over	Power Unit
40	1985 International Tractor	Cab-over	Power Unit
41	1993 Peterbuilt Tractor	Cab-over	Power Unit
42	1987 Kenworth Tractor	Long nose	Power Unit
43	1988 Kenworth Tractor	Long nose	Power Unit
44	1987 Kenworth Tractor	Long nose	Power Unit
45	1994 Kenworth Tractor	Long nose	Power Unit
46	1994 Peterbuilt Tractor	Long nose	Power Unit
47	1997 Kenworth Tractor	Long nose	Power Unit
48	1997 Kenworth Tractor	Long nose	Power Unit
49	1997 Kenworth Tractor	Long nose	Power Unit
50	1993 Kenworth Tractor	Long nose	Power Unit
51	1988 Peterbuilt	Long nose	Power Unit
52	1997 Kenworth Tractor	Long nose	Power Unit
53	1994 International Tractor	Cab-over	Power Unit
54	1995 Kenworth Tractor	Long nose	Power Unit
55	1990 Kenworth Tractor	Long nose	Power Unit
56	1993 Ford 350 Pack Van	16' High Cube Pack Van	Packing
57	1993 Ford 350 Pack Van	16' High Cube Pack Van	Packing

	UNIT	SIZE	PURPOSE / USE
58	1985 Ford Pack Van	Econoline Pack Van	Packing
59	1990 Isuzu Pack Van	15' High Cube Pack Van	Packing
60	1990 Isuzu Pack Van	15' High Cube Pack Van	Packing
61	1990 International Straight Truck	26' Straight Truck	Moving/Vault Delivery
62	1990 Hino Tractor	Cab-over	Power Unit
63	1986 Peterbilt Tractor	Cab-over	Power Unit
64	1985 International Tractor	Cab-over	Power Unit
65	1992 Freightliner Tractor	Cab-over	Power Unit
66	1988 Kentucky Trailer	48' Trailer	Moving
67	1985 Kentucky Trailer	48' Trailer	Moving
68	1983 Kentucky Trailer	45' Trailer	Moving/Vault Delivery
69	1984 Kentucky Trailer	45' Trailer	Moving
70	1970 Highway Trailer	45' Flat-bed	Moving
71	1984 Kalyn Tlt.	45' Flat-bed	Moving
72	1983 Trailmobile	48' Flat-bed	Moving
73	1980 Kentucky Trailer	40' Open-side	Moving
74	1986 Strick	48' Trailer	Moving
75	1983 Strick	48' Trailer	Moving
76	1998 Kentucky Trailer	53' Trailer	Moving
77	1998 Kentucky Trailer	51' Trailer	Moving
78	1994 International St. Truck	26' Straight Truck	Moving
79	1994 Ford Pack Van	16' High Cube Pack Van	Packing
80	1994 Ford Pack Van	16' High Cube Pack Van	Packing
81	1985 Kenworth Tractor	Long Nose	Power Unit

APPENDIX "2"

BAYSHORE TRANSPORTATION SYSTEM, INC.

STATEMENTS OF ASSETS, LIABILITIES AND EQUITY

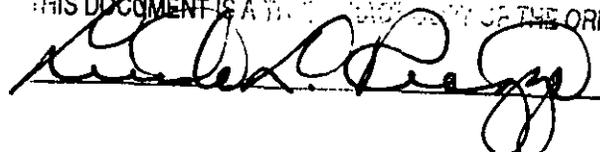
INCOME TAX BASIS

AS OF DECEMBER 31,

(See Accountants' Review Report)

ASSETS

	<u>1996</u>	<u>1995</u>	<u>Increase (Decrease)</u>
<u>CURRENT ASSETS</u>			
Cash and Cash Equivalents	\$ -0-	\$ 28,760	\$(28,760)
Certificates of Deposit	75,000	150,000	(75,000)
Accounts Receivable - Trade	1,139,929	1,043,827	96,102
Due from Commissioned Drivers	65,033	62,585	2,448
Prepaid Expenses	54,454	50,226	4,228
<u>TOTAL CURRENT ASSETS</u>	<u>\$1,334,416</u>	<u>\$1,335,398</u>	<u>\$ (982)</u>
<u>INVESTMENTS</u>			
NFC Shares Trust Limited (1,969 shares)	\$ 17,022	\$ 17,022	\$ -0-
<u>PROPERTY AND EQUIPMENT</u>			
Revenue Equipment	\$ 788,000	\$ 693,477	\$ 94,523
Office Equipment	131,293	118,814	12,479
Leasehold Improvements	158,924	120,074	38,850
Miscellaneous Equipment	308,508	274,277	34,231
	<u>\$1,386,725</u>	<u>\$1,206,642</u>	<u>\$180,083</u>
Less: Accumulated Depreciation	<u>1,053,633</u>	<u>925,288</u>	<u>128,345</u>
<u>NET PROPERTY AND EQUIPMENT</u>	<u>\$ 333,092</u>	<u>\$ 281,354</u>	<u>\$ 51,738</u>
<u>OTHER ASSETS</u>			
Security and Utility Deposits	\$ 575	\$ 575	\$ -0-
Loan Receivable - Stockholders	-0-	95,000	(95,000)
Cash Surrender Value - Officers' Life Insurance	97,883	84,283	13,600
<u>TOTAL OTHER ASSETS</u>	<u>\$ 98,458</u>	<u>\$ 179,858</u>	<u>\$(81,400)</u>
<u>TOTAL ASSETS</u>	<u>\$1,782,988</u>	<u>\$1,813,632</u>	<u>\$(30,644)</u>



LIABILITIES

	<u>1996</u>	<u>1995</u>	<u>Increase (Decrease)</u>
<u>CURRENT LIABILITIES</u>			
Cash Overdraft	\$ 22,294	\$ -0-	\$ 22,294
Accounts Payable - Trade	337,998	314,250	23,748
Due Allied Van Lines - Collections	119,620	87,991	31,629
Due Commissioned Drivers	126,801	50,396	76,405
Notes Payable (Due Within One Year)			
Allied Van Lines, Inc.	19,872	10,584	9,288
CoreStates Bank	83,457	201,480	(118,023)
Stockholder	10,000	10,000	-0-
<u>TOTAL CURRENT LIABILITIES</u>	<u>\$ 720,042</u>	<u>\$ 674,701</u>	<u>\$ 45,341</u>
<u>LONG-TERM LIABILITIES</u>			
Notes Payable (Due Over One Year)			
Allied Van Lines	\$ 40,869	\$ 28,217	\$ 12,652
CoreStates Bank	92,529	152,366	(59,837)
Stockholder	60,000	60,000	-0-
<u>TOTAL LONG-TERM LIABILITIES</u>	<u>\$ 193,398</u>	<u>\$ 240,583</u>	<u>\$ (47,185)</u>
<u>TOTAL LIABILITIES</u>	<u>\$ 913,440</u>	<u>\$ 915,284</u>	<u>\$ (1,844)</u>
<u>STOCKHOLDERS' EQUITY</u>			
<u>CONTRIBUTED CAPITAL</u>			
Common Stock, No Par (Authorized 250 Shares, Issued and Outstanding 250 Shares)	\$ 40,872	\$ 40,872	\$ -0-
<u>RETAINED EARNINGS (Exhibit C)</u>	<u>828,676</u>	<u>857,476</u>	<u>(28,800)</u>
<u>TOTAL STOCKHOLDERS' EQUITY</u>	<u>\$ 869,548</u>	<u>\$ 898,348</u>	<u>\$ (28,800)</u>
<u>TOTAL LIABILITIES AND STOCKHOLDERS' EQUITY</u>	<u>\$1,782,988</u>	<u>\$1,813,632</u>	<u>\$ (30,644)</u>

See accompanying notes.

APPENDIX "3"

BAYSHORE TRANSPORTATION SYSTEM, INC.STATEMENTS OF REVENUE AND EXPENSESINCOME TAX BASISFOR THE YEARS ENDED DECEMBER 31,

(See Accountants' Review Report)

	<u>1996</u>	<u>1995</u>	<u>Increase (Decrease)</u>
<u>INCOME (Schedule B-1)</u>			
Allied Van Lines	\$1,980,397	\$1,900,746	\$ 79,651
Bayshore Transportation System	<u>1,075,395</u>	<u>1,217,481</u>	<u>(142,086)</u>
<u>TOTAL INCOME</u>	<u>\$3,055,792</u>	<u>\$3,118,227</u>	<u>\$ (62,435)</u>
<u>OPERATING EXPENSES</u>			
Depreciation Expense	\$ 128,344	\$ 132,756	\$ (4,412)
Interest Expense	38,548	37,017	1,531
Profit Sharing Expense	17,795	3,946	13,849
Salaries and Wages (Schedule B-2)	1,351,302	1,307,941	43,361
Warehouse Rents	280,500	289,875	(9,375)
Transportation Expenses (Schedule B-2)	333,213	255,647	77,566
Other Operating Expenses (Schedule B-2)	<u>884,985</u>	<u>940,572</u>	<u>(55,587)</u>
<u>TOTAL OPERATING EXPENSES</u>	<u>\$3,034,687</u>	<u>\$2,967,754</u>	<u>\$ 66,933</u>
<u>INCOME FROM OPERATIONS</u>	<u>\$ 21,105</u>	<u>\$ 150,473</u>	<u>\$(129,368)</u>
<u>OTHER INCOME (EXPENSES)</u>			
Interest Income	\$ 20,898	\$ 7,277	\$ 13,621
Dividend Income	1,081	1,385	(304)
Discounts	12,140	-0-	12,140
Equipment Lease	-0-	1,400	(1,400)
Gain (Loss) on Sale of Assets	-0-	7,375	(7,375)
Net Officers' Life Insurance	<u>(4,024)</u>	<u>5,203</u>	<u>(9,227)</u>
<u>TOTAL OTHER INCOME (EXPENSES)</u>	<u>\$ 30,095</u>	<u>\$ 22,640</u>	<u>\$ 7,455</u>
<u>NET INCOME (Exhibits C - D)</u>	<u>\$ 51,200</u>	<u>\$ 173,113</u>	<u>\$(121,913)</u>

See accompanying notes.

Before The

PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF : DOCKET NO.
BAYSHORE TRANSPORTATION : A.114277, F.2
SYSTEM, INC. :
:

VERIFIED STATEMENT OF

Pierce Leahy Corporation

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY

Pierce Leahy
631 Park Avenue
King of Prussia, PA. 19406

II. IDENTITY AND QUALIFICATIONS OF WITNESS

Lawrence J. Sparacino
Director of Human Resources

III. GENERAL DESCRIPTION OF SUPPORTING PARTY

A full service provider of Record Management and related services. Storage for all major media including paper, computer tapes, optical discs, microfilm, video and x-rays. Total employees in North America 2300-350 work in Pennsylvania.

IV. VOLUME AND FREQUENCY OF INTENDED USE

Pierce Leahy relocates 25 to 35 families each year with Bayshore Transportation System, Inc.

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APPLICATION DOCKET
APR 01 1998
ENTRY No. *REM*

DOCUMENT
FOLDER

V. SPECIFIC AND/OR REPRESENTATIVE ORIGINS AND DESTINATIONS

<u>Origins</u>	<u>Destinations</u>
King of Prussia	Same as previously stated
Sharon Hill	
Folcroft	
Pittsburgh	

VI. TYPE OF SERVICE REQUIRED

With the number of locations in Pennsylvania, intra Pennsylvania relocations will be a great help.

VII. SIMILAR APPLICATIONS SUPPORTED

None

VIII. ADDITIONAL INFORMATION

Pennsylvania services will give Pierce Leahy the ability to make 1 call to Bayshore for all relocations, and allow us to receive the same quality of service.

V E R I F I C A T I O N

I, Lawrence J. Spasiano, Director of Human Resources
of Grace Leady, have reviewed the foregoing document
and verify that facts set forth therein are true and correct to the
best of my personal knowledge, information and belief and that this
verification is made subject to the penalties of 18 Pa. C.S. §4904.

Lawrence J. Spasiano

Before The

PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF : DOCKET NO.
BAYSHORE TRANSPORTATION : A.114277, F.2
SYSTEM, INC. :
:

VERIFIED STATEMENT OF

Chemical Leaman Corporation

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY

Chemical Leaman Corporation.
102 Pickering Way
Exton, PA. 19341

DOCKETED
APPLICATION DOCKET
APR 01 1998
ENTRY No. *1000*

II. IDENTITY AND QUALIFICATIONS OF WITNESS

Donna Riess, Manager of Compensation
Donna's experience covers all facets of
relocations, compensations and administers
the 401K program for all of their facilities.

III. GENERAL DESCRIPTION OF SUPPORTING PARTY

Chemical Leaman is a leader in bulk
transportation. Chemical Leaman has
75 facilities throughout the United States
and employ 2000 people.

IV. VOLUME AND FREQUENCY OF INTENDED USE

Chemical Leaman will have a need for re^locating
people within the state of Pennsylvania.
Rough estimate would be three to four times
a year.

FOLDER

V. SPECIFIC AND/OR REPRESENTATIVE ORIGINS AND DESTINATIONS

Chemical Leaman is headquartered in Exton, Pennsylvania. A number of their employees live in Chester and Delaware counties, mainly in the Lionville, Downingtown and Honeybrook areas.

VI. TYPE OF SERVICE REQUIRED

Bayshore Transportation is Chemical Leaman's exclusive household good mover. We have earned this right based on our previous performances in the shipping of household goods throughout the country.

VII. SIMILAR APPLICATIONS SUPPORTED

None

VIII. ADDITIONAL INFORMATION

Quality service is key and Bayshore Transportation System, Inc. has provided in the past and we will continue to use them for interstate business and hopefully for intra-state relocations as well.

V E R I F I C A T I O N

I, Donna Riess, Mgt. Compensation
of Chemical Leaman Corp., have reviewed the foregoing document
and verify that facts set forth therein are true and correct to the
best of my personal knowledge, information and belief and that this
verification is made subject to the penalties of 18 Pa. C.S. §4904.

Donna Riess
March 5, 1998

From	Mary Beth Soja
Co.	Bayshore
Phone #	366-0220
Fax #	366-8085

Before The

PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF : DOCKET NO.
 BAYSHORE TRANSPORTATION : A.114277, F.2
 SYSTEM, INC. :
 :

VERIFIED STATEMENT OF

Mary Beth Soja

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY

Du Pont Company Nemours 10531
 1007 Market Street
 Wilmington, DE. 19898

DOCKETED
 APPLICATION DOCKET
 APR 07 1998
 ENTRY No. DEM

II. IDENTITY AND QUALIFICATIONS OF WITNESS

Mary Beth Soja
 Manager, Relocation and Reimbursements Services
 Extensive experience in Domestic and International Relocations.

Supervisor

III. GENERAL DESCRIPTION OF SUPPORTING PARTY

Du Pont is one of the regions foremost fortune 100 companies. Du Pont is a major employer with worldwide locations. Particularly strong in Philadelphia area, as it is headquartered in Wilmington, DE.

IV. VOLUME AND FREQUENCY OF INTENDED USE

Variable - A ~~small~~ number of our employees live in Pennsylvania. Numerous local moves within Pennsylvania due to continuation moves resulting from storage in transit and point to point relocations.

DOCUMENT
 FOLDER

V.

SPECIFIC AND/OR REPRESENTATIVE ORIGINS AND DESTINATIONS

Primarily in the surrounding counties of Philadelphia; Chester and Delaware counties being primary.

VI.

TYPE OF SERVICE REQUIRED

Bayshore is one of the Du Pont Companies relocation partners. We expect our vendors in this industry to self-pack and self-haul. Bayshore would therefore be called upon for the relocation of our employees within foresaid counties.

VII.

SIMILAR APPLICATIONS SUPPORTED

None

VIII.

ADDITIONAL INFORMATION

Bayshore is one of our highest volume and highest quality service providers. I look forward to continuing the utilization of these services within the Chester and Delaware counties.

VERIFICATION

I, Mary Beck Soja,
of Du Pont Co., have reviewed the foregoing document
and verify that facts set forth therein are true and correct to the
best of my personal knowledge, information and belief and that this
verification is made subject to the penalties of 18 Pa. C.S. §4904.

Mary C. Soja

Before The

PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF	:	DOCKET NO.
HAYSHORE TRANSPORTATION	:	A.114277, P.2
SYSTEM, INC.	:	

VERIFIED STATEMENT OF

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY

ARCO Chemical Company
3801 West Chester Pike
Newtown Square, PA 19073

DOCKETED
 APPLICATION DOCKET
 APR 01 1998
 ENTRY No. *Am*

II. IDENTITY AND QUALIFICATIONS OF WITNESS

Mr. Daniel Mallor
Facilities Manager
Directs the relocation of personnel and material.

III. GENERAL DESCRIPTION OF SUPPORTING PARTY

ARCO Chemical manufactures inorganic chemicals. They currently employ approximately 2,000 and have facilities in Chester, Delaware and out of state.

IV. VOLUME AND FREQUENCY OF INTENDED USE

15-20 Relocations per year.

DOCUMENT
 FOLDER

V. SPECIFIC AND/OR REPRESENTATIVE ORIGINS AND DESTINATIONS

Newtown Square, PA to West Chester, PA
Newtown Square, PA to Philadelphia County
Allegheny County

West Chester, PA to Newton Square, PA
Philadelphia County
Allegheny County

VI. TYPE OF SERVICE REQUIRED

Relocate material and personnel on air ride tractors and trailers utilizing the specialized equipment normally employed by household movers.

VII. SIMILAR APPLICATIONS SUPPORTED

None

VIII. ADDITIONAL INFORMATION

Bayshore Transportation Company would improve our ability to relocate material and personnel throughout Pennsylvania.

VERIFICATION

I, Daniel F. Mellon, Facilities Manager
of APCO Chemical Company, have reviewed the foregoing document
and verify that facts set forth therein are true and correct to the
best of my personal knowledge, information and belief and that this
verification is made subject to the penalties of 18 Pa. C.S. 54904.

Daniel F. Mellon

Before The

PENNSYLVANIA PUBLIC UTILITY COMMISSION

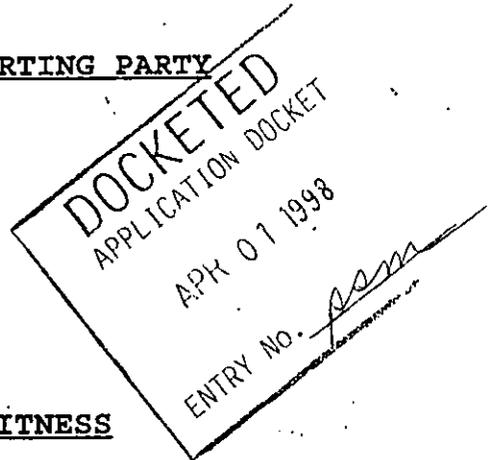
APPLICATION OF : DOCKET NO.
BAYSHORE TRANSPORTATION : A.114277, F.2
SYSTEM, INC. :
:

VERIFIED STATEMENT OF

Shared Medical Systems Corporation

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY

Shared Medical Systems Corporation
51 Valley Stream Parkway
Malvern, PA 19355-1406



II. IDENTITY AND QUALIFICATIONS OF WITNESS

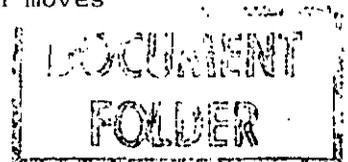
Edward J. Mininger, CTL, CPM
Manager, Purchasing/Logistics Services

III. GENERAL DESCRIPTION OF SUPPORTING PARTY

SMS provides medical ^{information systems} support to hospitals with over 5,000 employees and facilities throughout the country.

IV. VOLUME AND FREQUENCY OF INTENDED USE

The intra-service will be needed for one to ten moves per year.



V.

SPECIFIC AND/OR REPRESENTATIVE ORIGINS AND DESTINATIONS

Origin:
Malvern

Destinations:
Altoona
Wilkes Barre
Pittsburgh

VI.

TYPE OF SERVICE REQUIRED

Occasionally, some equipment may need to be stored in a climate controlled facility or moving van.

VII.

SIMILAR APPLICATIONS SUPPORTED

None

VIII.

ADDITIONAL INFORMATION

Bayshore is doing interstate business, this will allow SMS to make one call for all moving services. Also gives SMS the same quality service and better availability.

VERIFICATION

I, Ed MININGER, MANAGER, Purchasing
of SMS (Shared Medical Systems) have reviewed the foregoing document
and verify that facts set forth therein are true and correct to the
best of my personal knowledge, information and belief and that this
verification is made subject to the penalties of 18 Pa. C.S. §4904.

Ed Mininger

Before The

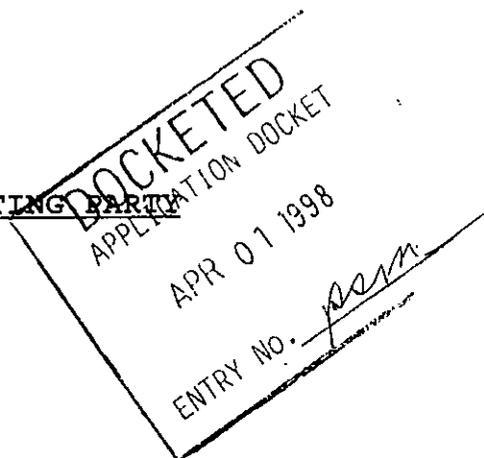
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF : DOCKET NO.
BAYSHORE TRANSPORTATION : A.114277, F.2
SYSTEM, INC. :
:

VERIFIED STATEMENT OF

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY

Epsilon Products Company
P.O.Box 432
Post Road & Blueball Avenue
Marcus Hook, PA 19061



II. IDENTITY AND QUALIFICATIONS OF WITNESS

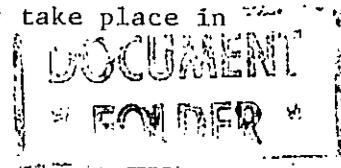
Ms. Meg Kennedy - Human Resources Manager
Ms. Kennedy is responsible for all permanent household moves, all office relocations, all temporary relocations, and all commercial and household storage.
Ms. Kennedy does this on behalf of all company employees as part of her position as Human Resource Manager.

III. GENERAL DESCRIPTION OF SUPPORTING PARTY

Manufacture of Polypropalyne Products with 145 employees. There are currently two locations, Marcus Hook, PA and Garyville, LA.

IV. VOLUME AND FREQUENCY OF INTENDED USE

Due to the new facility in Garyville, LA many new employees will be trained in Marcus Hook, PA; 15 relocations may take place in 1998.



V. SPECIFIC AND/OR REPRESENTATIVE ORIGINS AND DESTINATIONS

Origins-Counties: All in Chester or Delaware

Destinations: Chester, Delaware, Allegheny, and Monroe

VI. TYPE OF SERVICE REQUIRED

Bayshore would provide Intra-State Relocation Service in addition to our existing Inter-State Service, eliminating the need to shop for other van lines involvement. In addition, equipment provided by Bayshore to complete a successful office move.

VII. SIMILAR APPLICATIONS SUPPORTED

None

VIII. ADDITIONAL INFORMATION

I have been very happy with existing Interstate Relocations using Bayshore and I look forward to using them for my Pennsylvania Relocations as well.

V E R I F I C A T I O N

I, Meg Kennedy, Sen. H.R. Representative
of Epsilon Products Co., have reviewed the foregoing document
and verify that facts set forth therein are true and correct to the
best of my personal knowledge, information and belief and that this
verification is made subject to the penalties of 18 Pa. C.S. §4904.

Meg Kennedy

Before The

PENNSYLVANIA PUBLIC UTILITY COMMISSION

APR 01 1998

APPLICATION OF : DOCKET NO.
BAYSHORE TRANSPORTATION : A.114277, F.2
SYSTEM, INC. :
:

VERIFIED STATEMENT OF

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY

Naviant Technology Solutions, Inc.
200 Four Falls Corporate Center
Suite 308
W. Conshohocken, PA 19428

DOCKETED
APPLICATION DOCKET
APR 01 1998
ENTRY No. *asm*

II. IDENTITY AND QUALIFICATIONS OF WITNESS

Mrs. Lisa Roach - Office and Facilities Manager
Mrs. Roach directs the relocation of company personnel and material between company locations throughout Pennsylvania and the United States.

III. GENERAL DESCRIPTION OF SUPPORTING PARTY

Naviant is a technical consulting and systems integration company with approximately 100 employees. The company will be relocating to Chester County and will require the services of Bayshore to transport personnel, office equipment and material throughout Southern Pennsylvania.

IV. VOLUME AND FREQUENCY OF INTENDED USE

Frequency of use will be on an as needed basis and will increase as the company expands throughout Pennsylvania. But, in particular throughout Southern Pennsylvania.

DOCUMENT
FOLDER

V. SPECIFIC AND/OR REPRESENTATIVE ORIGINS AND DESTINATIONS

Newtown Square, PA to locations throughout Pennsylvania.

This is an expanding concern, as new locations are opened additional transportation services will be required..

VI. TYPE OF SERVICE REQUIRED

Relocate material and personnel on air ride tractor and trailers utilizing the equipment normally employed by household movers.

VII. SIMILAR APPLICATIONS SUPPORTED

None

VIII. ADDITIONAL INFORMATION

Bayshore Transportation would be an asset to our ability to relocate personnel and material within both Chester and Delaware Counties, Intra-State Pennsylvania and Inter-State.

V E R I F I C A T I O N

I, Lisa D. Reach, Office Manager
of Naviant Technology Solutions, Inc. have reviewed the foregoing document
and verify that facts set forth therein are true and correct to the
best of my personal knowledge, information and belief and that this
verification is made subject to the penalties of 18 Pa. C.S. §4904.

Lisa D. Reach

Before The

PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF : DOCKET NO.
BAYSHORE TRANSPORTATION : A.114277, F.2
SYSTEM, INC. :
:

VERIFIED STATEMENT OF

I. LEGAL NAME AND DOMICILE OF SUPPORTING PARTY

Zeneca Pharmaceuticals
1800 Concord Pike
Wilmington, DE 19817

II. IDENTITY AND QUALIFICATIONS OF WITNESS

Rod Smith, Logistics Coordinator

Rod Smith has extensive experience in the field of Traffic. He is responsible for overseeing all Traffic functions for Zeneca Pharmaceuticals.

III. GENERAL DESCRIPTION OF SUPPORTING PARTY

Zeneca is a leader in Research, Development and Distribution of Pharmaceuticals. Zeneca is a major employer of individuals through-out the United States. In addition to researchers, developers and supporting staff, Zeneca employs salespeople in specific markets.

IV. VOLUME AND FREQUENCY OF INTENDED USE

As Zeneca grows and adjusts to the Pharmaceutical Industry the need for relocations within Pennsylvania will fluxuate. A rough estimate would be that during the course of a year the need may arise six - ten times.

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APPLICATION DOCKET
APR 07 1998
ENTRY NO. *ASM*

DOCUMENT
FOLDER

V. SPECIFIC AND/OR REPRESENTATIVE ORIGINS AND DESTINATIONS

With Zeneca being headquartered in North Wilmington, a number of employees reside in the Chester and Delaware Counties. For more specific see below:

Chadds Ford, West Chester, Kennett Square and so forth..

VI. TYPE OF SERVICE REQUIRED

Bayshore Transportation is one of our qualified Household Goods Movers. Zeneca utilizes the services of a few movers for Interstate assistance. During the course of a move the transferring family develops a bond with the mover, since many of our (Zeneca's) employees move multiple times they will request the services of their previous mover, if services provided were exceptional.

VII. SIMILAR APPLICATIONS SUPPORTED

None

VIII. ADDITIONAL INFORMATION

Due to the high quality service that Bayshore Transportation System, Inc. provides we look forward to continuing to utilize their services in the Interstate arena and soon in the Intra-Pennsylvania arena as well.

VERIFICATION

I, Roderick D Smith, Logistics Coordinator
of Zeneca Pharmaceuticals, have reviewed the foregoing document
and verify that facts set forth therein are true and correct to the
best of my personal knowledge, information and belief and that this
verification is made subject to the penalties of 18 Pa. C.S. §4904.



JOHN W. PELINO
MARTIN R. LENTZ
BARRY E. BRESSLER
RICHARD W. KESSLER
SALVATORE M. DEBUNDA
RICHARD N. WEINER
KENNETH J. LEVIN
LOUIS J. SINATRA
ROBERT A. HANAMIRIAN
JEANNE SCHUBERT BARNUM**
HOWARD A. ROSENTHAL
VICTORIA PAGE-WOOTEN*
GARY D. FRY*
CRISTINA G. CAVALIERI
KAREN A. FAHRNER*
EDWARD L. CIEMNIECKI*
DEBRA CSIK KERN*
DOROTHY FECHT LUNTEY*
PAUL R. FITZMAURICE*
JILL M. BELLAK*
PATRICK J. DORAN*
RONALD L. DAUGHERTY*
JAMES E. MILLER*
KEVIN J. KILDUFF*
MICHAEL D. ALLEN
ERIN B. SANTAMARIA*
JAMES C. SHAH*

* ALSO MEMBER NJ BAR
* ALSO MEMBER FL BAR
* MEMBER OF NY & MA BARS ONLY

DIRECT DIAL (215)

Peter S. Marzolf, Supervisor
Compliance Office - Technical Unit
Bureau of Transportation and Safety
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

LAW OFFICES

PELINO & LENTZ

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PHILADELPHIA, PA 19103-7393

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FAX (215) 665-1536

April 24, 1997

OF COUNSEL
ALBERT W. SCHIFFRIN
ELLIOT UNTERBERGER
C. RICHARD HORROW

HENRY W. MAXMIN
(1978-1990)

PELINO & LENTZ
30 SOUTH HADDON AVENUE
HADDONFIELD, NJ 08033-9975
(609) 428-9484

*NJ MANAGING ATTORNEY

Re: **Application of Bayshore Transportation System, Inc.**
Docket No.: A-114277, F.2

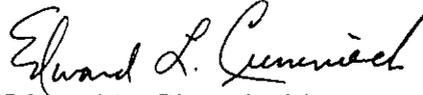
Dear Mr. Marzolf:

This will confirm our telephone conversation of Wednesday, April 22, 1998 at which time you advised me that, due to an internal processing oversight on the part of Commission staff, the Verified Statements submitted in the above-captioned matter by Bayshore Transportation System, Inc. have yet to be reviewed and analyzed.

As I mentioned to you during our conversation, my client is very anxious to finalize this matter and initiate Pennsylvania intrastate household goods operations. Your assistance in expediting the further processing of this matter, including the drafting of an appropriate Order for consideration by the Commission, will be greatly appreciated.

Please advise me if you require anything further from the applicant or if you encounter any difficulties which would further delay the processing of this matter.

Very truly yours,


Edward L. Ciemiecki

ELC/slw

cc: Mr. Matt Larmore