

JOHN F. PYFER, JR.
ROBERT H. REESE, JR.
CHRISTOPHER C. STRAUB
SANDRA EDWARDS GRAY
GABRIELLA H. FARHAT
• WAYNE F. GREEN
ROBERT C. WEE
TAMARA E. SHOWALTER
THOMAS C. WEE
CONNIE J. ZAPPIA
STEPHANIE L. LONGENBERGER

• ALSO A MEMBER OF THE
NEW JERSEY BAR

PYFER & REESE

ATTORNEYS AT LAW

A professional corporation

128 NORTH LIME STREET
P.O. BOX 1597
LANCASTER, PENNSYLVANIA 17608-1597
TELEPHONE (717) 299-7342
www.pyferreese.com

TOLL FREE 1-888-793-3773

LANCASTER FAX (717) 299-1376

MOBILE (717) 940-4585

WILLOW STREET OFFICE
2801 WILLOW STREET PIKE
P.O. BOX 157
WILLOW STREET, PENNSYLVANIA 17584
TELEPHONE (717) 464-5900

WILLOW STREET FAX (717) 464-3818

EPHRATA OFFICE
18 NORTH STATE STREET
EPHRATA, PENNSYLVANIA 17522
TELEPHONE (717) 733-1500

RECEIVED

April 17, 1998

APR 17 1998

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

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

Re: Lancaster Emergency Medical Services Association
Docket No.: A-00114732

Dear Mr. McNulty:

Please find enclosed, an original and three (3) copies of the Notice entering our appearance as attorneys for Ephrata Community Ambulance Association and the Protest which we have prepared on behalf of our client in the above captioned matter.

Please note that a copy of each of the above mentioned documents have been forwarded to the Applicant, Lancaster Emergency Medical Services Association.

Thank you.

Very truly yours,



STEPHANIE L. LONGENBERGER

SLL

Enclosures

cc: Lancaster Emergency Medical Services Association
Ephrata Community Ambulance Association

63

RECEIVED

COMMONWEALTH OF PENNSYLVANIA

BEFORE THE

APR 17 1998

PENNSYLVANIA PUBLIC UTILITY COMMISSION, PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

In the Matter of: Lancaster Emergency Medical Services
Association, Inc.
Docket No.: A-00114732


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NOTICE OF APPEARANCE

Please enter the appearance of Christopher C. Straub and Pyfer & Reese in the above-designated matter on behalf of Ephrata Community Ambulance Association.

I am authorized to accept service on behalf of said participant in this matter. On the basis of this notice, I request a copy of each document hereafter issued by the Commission in this matter.

PYFER & REESE

By: 

Christopher C. Straub
Attorney for Ephrata Community
Ambulance Association
Attorney I.D. No. 29163
128 North Lime Street
P.O. Box 1597
Lancaster, PA 17603-1597
Telephone: 717-299-2842
Facsimile: 717-299-1376

Dated: 4/17/98

DOCKETED
APR 22 1998
ENTRY NO. 1000

COMMONWEALTH OF PENNSYLVANIA

RECEIVED

BEFORE THE

APR 17 1998

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
ARBITRATOR'S OFFICE

LANCASTER EMERGENCY MEDICAL SERVICES ASSOCIATION, INC.

1829 Lincoln Highway East, Lancaster, Lancaster County 17604-4652

DOCKET NO. A-00114732

PROTEST ON BEHALF OF

EPHRATA COMMUNITY AMBULANCE ASSOCIATION, INC.

AND NOW, comes Ephrata Community Ambulance Association, Inc. (Protestant) by and through its attorneys, Christopher C. Straub, Esquire, and Pyfer & Reese and protests the above application and in support thereof states as follows:

1. The name, business address and telephone number of the Protestant are as follows:

Ephrata Community Ambulance Association, Inc.
528 West Main Street
Ephrata, PA 17522-1738
Telephone: (717) 733-2821
P.U.C.#: A-00113749

2. The name, business address and telephone number of the Protestant's attorneys are as follows:

Pyfer & Reese, P.C.
128 North Lime Street
P.O. Box 1597
Lancaster, PA 17608-1597
Telephone: (717) 299-7342

3. Protestant is hereby filing a written protest of the application for Motor Carrier as common carriers for transportation of persons identified by Docket No. A-00114732 as set forth at 52 Pa. Code § 3.381.

4. Protestant holds authority in conflict with this application. The Protestant's service area includes all points within 40 air miles of Ephrata Borough in Lancaster County. The Applicant is requesting a grant of authority to service all points in Lancaster County. The Applicant's requested service area is within the service area already granted to the Protestant. The relevant portion of Protestant's authority is summarized in Appendix "A" attached hereto.

5. Protestant is filing a formal Protest against Applicant in regard to this conflict with Protestant's authority.

6. The approval of this application would provide direct and unfair competition for this geographic area with a resulting decrease in business volume and potential growth for the existing service of the Protestant.

7. Protestant requests that the Applicant's service area be restricted to all points of Lancaster County not within a 10 air mile radius of the center of Ephrata Borough. This amendment would result in a withdrawal of the protest by the Ephrata Community Ambulance Association, Inc.

8. Pursuant to Section 333(c) of the Public Utility Code (66 Pa. C.S.A. § 333(c)), Protestant hereby requests a list of the

witnesses expected to testify in the above-entitled proceeding together with the subject matter of their anticipated testimony.

9. The applicant, Lancaster Emergency Medical Services Association, Inc., 1829 Lincoln Highway East, Lancaster, PA 17604-4652 has been served notice of this protest by first class mail.

Respectfully submitted,

PYFER & REESE

By:



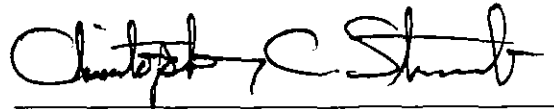
Christopher C. Straub
Attorneys for Protestant
Attorney I.D. No. 29163
128 North Lime Street
P.O. Box 1597
Lancaster, PA 17608-1597
Telephone: (717) 299-7342
Facsimile: (717) 299-1376

Dated: _____

4/17/98

VERIFICATION

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



Christopher C. Straub, Esquire

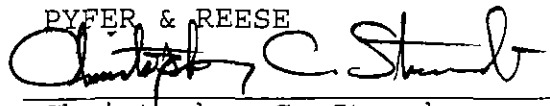
Dated: 4/17/98

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed elow, in accordance with the requirements of 52 Pa. Code § 1.54.

Lancaster Emergency Medical Services Association, Inc.
1829 Lincoln Highway East
Lancaster, PA 17604-4652

Dated this 17th day of April, 1998.

PYFER & REESE
By: 
Christopher C. Straub
Attorneys for Ephrata Community
Ambulance Association, Inc.
Attorney I.D. No. 29163

1608

NOTICES

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Railroad
With Hearing

C-00970911. Department of Transportation v. Consolidated Rail Corporation, et al. A complaint has been made to the Pennsylvania Public Utility Commission (Commission), under the provisions of the Public Utility Code. The complainant states the crossing with Conrail and State Route 0741 in East Hempfield Township, Lancaster County (AAR No. 517 590 F) needs to be repaired as a result of failed field panels and protruding lags. This crossing is the subject of a prior Commission Order at Application Doc. No. A-00105400 wherein the Commission ordered Conrail to maintain its facilities. Additional respondents are East Hempfield and Lancaster County.

An initial hearing on this matter will be held Wednesday, May 6, 1998, at 10 a.m. in an available hearing room, Ground Floor, North Office Building, North Street and Commonwealth Avenue, Harrisburg, PA, when and where all persons in interests may appear and be heard, if they so desire.

JAMES J. MCNULTY,
Secretary

(Pa. B. Doc. No. 98-512. Filed for public inspection March 27, 1998, 9:00 a.m.)

Railroad
With Hearing

C-00957388. Stewartstown Borough v. Stewartstown Railroad Company, et al. A complaint has been made to the Pennsylvania Public Utility Commission, under the provisions of Public Utility Code. The complainant alleges deplorable conditions of paving at two Stewartstown Rail locations in the Borough of Stewartstown and asks that improvements be made to insure a smooth ride. Additional respondents are: Pennsylvania Department of Transportation and the County of York.

An initial hearing on this matter will be held Thursday, May 14, 1998, at 10 a.m. in an available hearing room, Ground Floor, North Office Building, North and Commonwealth Avenue, Harrisburg, PA, when and where all persons in interests may appear and be heard, if they so desire.

JAMES J. MCNULTY,
Secretary

(Pa. B. Doc. No. 98-513. Filed for public inspection March 27, 1998, 9:00 a.m.)

Service of Notice of Motor Carrier Applications

The following temporary authority and/or permanent authority applications for the right to render service as a common carrier or contract carrier in this Commonwealth have been filed with the Pennsylvania Public Utility Commission. Publication of this notice shall be considered

as sufficient notice to all carriers holding authority from this Commission. Applications will be considered without hearing in the absence of protests to the application. Protests to the applications published herein are due on or before April 20, 1998, as set forth at 52 Pa. Code § 3.381 (relating to applications for transportation of property and persons). The protest shall also indicate whether it applies to the temporary authority application or the permanent application or both.

Applications of the following for approval of the beginning of the exercise of the right and privilege of operating as common carriers for transportation of persons as described under each application.

A-00114782. Lancaster Emergency Medical Services Association, Inc. (1829 Lincoln Highway East, Lancaster, Lancaster County, PA 17604-4652), a corporation of the Commonwealth of Pennsylvania—persons in paratransit service, between points in the county of Lancaster, and from points in said county, to other points in Pennsylvania, and vice versa.

A-00114784. Hope Mills Limo, Incorporated (1183 Old Mercer Road, Mercer, Mercer County, PA 18137), a corporation of the Commonwealth of Pennsylvania—persons in limousine service, between points in the county of Mercer, and from points in said county, to other points in Pennsylvania, and return. Attorney: David Goodwin, P.O. Box 673, Sharon, PA 16146.

Applications of the following for amendment to the certificate of public convenience approving the operation of motor vehicles as common carriers for transportation of persons as described under each application.

A-00112339. Folder 1, Am-A. Best of Times Chauffeured Limousine Service, Inc. (1154 Sunnyside Pike, Lansdale, Montgomery County, PA 19446), a corporation of the Commonwealth of Pennsylvania—persons in limousine service, between points in the counties of Montgomery, Bucks, Chester and Delaware and the city and county of Philadelphia, located within an airline distance of 15 statute miles of the boundaries of Montgomery County, and from points in said territory, to other points in Pennsylvania, and return. Attorney: Richard T. Mulcahey, Jr., Two Penn Center, Suite 1400, 1500 John F. Kennedy Boulevard, Philadelphia, PA 19102-1890.

Applications of the following for approval of the beginning of the exercise of the right and privilege of operating motor vehicles as common carriers for the transportation of persons by transfer of rights as described under each application.

A-00114781. Amish Neighbors, Inc. (750 May Post Office Road, Strasburg, Lancaster County, PA 17579), a corporation of the Commonwealth of Pennsylvania—(1) persons in group and party service from the Willow Valley Family Resort and Conference Center in the township of West Lampeter; the Circle M Ranch Campground in the township of Pequea; the Millersville Lion Club Community Building in the borough of Millersville; and from 110 Circle Road, in the borough of Millersville; all in Lancaster County, to points in Pennsylvania; subject to the following condition: that no right, power or privilege is granted to provide transportation in motor vehicles having a seating capacity exceeding 15 passengers, and (2) persons, on tours, or sight-seeing trips and special excursions, between points in the townships of West Lampeter, Strasburg and Paradise, the borough of Strasburg, all located in the county of Lancaster, and from points in said townships and borough, to points in

A-00113749

Group and Party-Pa. PUC No. 1

Ephrata Community Ambulance Association, Inc.

To transport, as a common carrier, persons in paratransit services, between points in the Borough of Ephrata, Lancaster County, and within an airline radius of forty (40) statute miles of the limits of said Borough, and from points in said territory, to points in Pennsylvania, and return.

Issued: July 10, 1997

Effective: July 11, 1997

Issued under authority of PA. Code, Title 52, Section 23.42

Ephrata Community Ambulance Association, Inc.
528 West Main Street
Ephrata, Pennsylvania 17522-1738
Leslie R. Martzall, President
Tele: 717.733.2821

LAW OFFICES OF
STEVENS & LEE
A PROFESSIONAL CORPORATION

PLEASE RESPOND TO HARRISBURG

April 22, 1998

RECEIVED
98 APR 22 PM 2:58
P.A.P.U.C.
PROTHONOTARY'S OFFICE

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

Re: Application of Lancaster Emergency Medical Services Association, Docket No. A-00114732

Dear Secretary McNulty:

Please find enclosed an original and three copies of the Notice of Appearance of the undersigned counsel for filing on behalf of the Applicant, Lancaster Emergency Medical Services Association, in the above captioned proceeding. As indicated by the attached Certificate of Service, all parties of record have been served a copy hereof.

Should you have any questions or comments, please feel free to contact my office.

Sincerely,

STEVENS & LEE

Kenneth Zielonis
Kenneth Zielonis

/dle
Attachment

cc: File

DOCKETED
APPLICATION DOCKET
APR 29 1998
ENTRY No. *asm*

44

IN THE COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that, on this 22nd day of April, 1998, I have served true and correct copies of the foregoing document upon the persons set forth below by First Class Mail, postage prepaid or by hand-delivery (unless service is otherwise indicated), in accordance with 52 Pa. Code Section 1.54:

Stephanie L. Longenberger, Esq.
Pyfer & Reese
128 North Lime Street
P.O. Box 1597
Lancaster, PA 17608-1597

93 APR 27 PM 8:00

Kenneth Zielonis
Kenneth Zielonis, Esq.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Lancaster :
Emergency Medical Services : Docket No. A-00114732
Association :

NOTICE OF APPEARANCE

Please enter my appearance in the above captioned proceeding on behalf of the Applicant, Lancaster Emergency Medical Services Association. I am authorized to accept service on behalf of said participant in this matter. On the basis of this notice, I request a copy of each document hereafter issued by the Commission in this matter.

Respectfully submitted,

STEVENS & LEE

Kenneth Zielonis

Kenneth Zielonis, Esq.
208 North Third Street, Ste. 310
P.O. Box 12090
Harrisburg, PA 17108-2090
(717) 234-1250
(717) 234-1939 Fax

Dated: April 22, 1998

Attorneys for Lancaster Emergency
Medical Services Association

RECEIVED
98 APR 22 PM 2:58
P.A. U.C.
P. U. C. OFFICE



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

IN REPLY PLEASE
REFER TO OUR FILE

May 19, 1998

In Re: **A-00114732**

(See attached list)

**Application of Lancaster Emergency Medical Services Association,
Inc.**

148737

For the right to begin to transport, as a common carrier by motor vehicle, persons in paratransit service, between points in the county of Lancaster, and from points in said county, to other points in Pennsylvania, and vice versa.

Hearing Notice

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

RECEIVED
SECRETARY'S BUREAU
98 MAY 20 PM 2:44

Type: **Initial**

Date: **Thursday, July 16, 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: **Administrative Law Judge George M. Kashi
P.O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 783-5452
Fax: (717) 787-0481**

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

DOCKETED
MAY 21 1998

**DOCUMENT
FOLDER**

EEF

JW

If you intend to file exhibits, 2 copies of all hearing exhibits to be presented into evidence must be submitted to the reporter. An additional copy must be furnished to the Presiding Officer. A copy must also be provided to each party of record.

Except for those individuals representing themselves, the Commission's rules require that all parties have an attorney; therefore, you should have an attorney of your choice file an entry of appearance before the scheduled hearing.

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 Kashi
Norma Lewis
Steve L. Springer, Scheduling Officer
Beth Plantz
Docket Section
Calendar File

LAW OFFICES OF
STEVENS & LEE
A PENNSYLVANIA PROFESSIONAL CORPORATION

PLEASE RESPOND TO HARRISBURG

June 2, 1998

RECEIVED
JUN 03 1998

The Honorable George M. Kashi
Administrative Law Judge
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Lancaster Emergency Medical Services Association, Inc. Docket No. A-00114732

Dear Judge Kashi:

There is a hearing scheduled for July 16, 1998 in the above captioned proceeding. I am scheduled for a family vacation for the week of July 13, 1998. Therefore, I request a postponement of the above captioned hearing to the next available date. Council for the sole Protestant, Christopher C. Straub, concurs in this request. Thank you for your consideration.

Sincerely,

STEVENS & LEE



Kenneth Zielonis, Esq.

/dle

cc: C.C. Straub, Esq.
File

DOCKETED
JUN 05 1998

DOCUMENT
FOLDER

RECEIVED
98 JUN -11 AM 10:00
P.A.P.U.C.
SECRETARY'S BUREAU

EEF

208 North Third Street, Suite 310, P.O. Box 12090, Harrisburg, PA 17108-4090 • 717-234-1250 Fax 717-234-1939
1415 Route 70 East, Suite 506, Cherry Hill, NJ 08034 • 609-354-9200 Fax 609-354-8111
One Penn Square, P.O. Box 1594, Lancaster, PA 17608-1594 • 717-291-1031 Fax 717-394-7726
190 Broadhead Road, Suite 200, P.O. Box 20630, Lehigh Valley, PA 18002-0830 • 610-691-7111 Fax 610-691-7175
Two Penn Center Plaza, Suite 200, Philadelphia, PA 19102-1702 • 215-854-6370 Fax 215-569-0216
111 North Sixth Street, P.O. Box 679, Reading, PA 19603-0679 • 610-478-2000 Fax 610-376-5610
116 North Washington Avenue, Suite 2B, Scranton, PA 18503 • 717-343-1827 Fax 717-343-1892
One Glenhardie Corporate Center, 1275 Drummers Lane, P.O. Box 236, Wayne, PA 19087-0236 • 610-964-1480 Fax 610-687-1384
289 North Main Street, Wilkes-Barre, PA 18702-4409 • 717-823-6116 Fax 717-823-1149



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

IN REPLY PLEASE
REFER TO OUR FILE

June 3, 1998

In Re: **A-00114732**

(See letter dated 05/19/98)

**Application of Lancaster Emergency Medical Services Association,
Inc.**

For the right to begin to transport, as a common carrier by motor vehicle, persons in paratransit service, between points in the county of Lancaster, and from points in said county, to other points in Pennsylvania, and vice versa.

Hearing Cancellation/Reschedule Notice

This is to inform you that the Initial Hearing on the above-captioned case previously scheduled for Thursday, July 16, 1998 at 10:00 a.m. in Harrisburg, Pennsylvania has been canceled.

The hearing has been **rescheduled** as follows:

Type: **Initial**
Date: **Friday, July 24, 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: **Administrative Law Judge George M. Kashig
P. O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 783-5452
Fax: (717) 787-0481**

EEF

DOCKETED

JUN 04 1998

150932

RECEIVED
SECRETARY'S BUREAU
98 JUN -4 AM 11:07

JW

Please change our 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 Kashi
Norma Lewis
Steve L. Springer, Scheduling Officer
Beth Plantz
Docket Section
Calendar File

LAW OFFICES OF
STEVENS & LEE
A PENNSYLVANIA PROFESSIONAL CORPORATION

DOCUMENT
FOLDER

PLEASE RESPOND TO HARRISBURG

DOCKETED

JUL 27 1998

July 23, 1998

RECEIVED

JUL 23 1998

Hon. George M. Kashi
Administrative Law Judge
PA Public Utility Commission
North Office Building
P.O. Box 3265
Harrisburg, PA 17105-3265

EEF

Re: Application of Lancaster Emergency Medical Services Association, Docket No. A-00114732

Dear Judge Kashi:

As I indicated in our telephone conversation this morning, the parties in this proceeding have reached a settlement in principle. We are reducing that settlement to writing. Christopher Straub, Esq. represents the sole Protestant, Ephrata Community Ambulance Association, has indicated he will either contact yo directly with this same message or converse with you in writing. Therefore, there is no need for the hearing scheduled for tomorrow and request that it be cancelled.

Should you have any questions, please feel free to contact my office.

Respectfully submitted,

STEVENS & LEE

Kenneth Zielonis

Kenneth Zielonis, Esq.

RECEIVED
98 JUL 24 AM 9:51
PA.P.U.C.
SECRETARY'S BUREAU

/dle

cc: C. Straub
File

COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION

DATE: July 23, 1998

SUBJECT: **A-00114732 Application of Lancaster Emergency Medical Services Association, Inc.
Modified Procedure**

TO: Peter Marzolf
Transportation & Safety

FROM: Steve Springer, Scheduling Officer *52*
Office of Administrative Law Judge

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

pc: ALJ Kashi
Aggie Brewster, Docket Section
Norma R. Lewis
Beth Plantz
Office File

DOCUMENT
FOLDER

DOCKETED
JUL 28 1998

EEF

SECRETARY'S BUREAU
GENERAL

98 JUL 27 09:28

159635

JW



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

IN REPLY PLEASE
REFER TO OUR FILE

July 23, 1998

In Re: **A-00114732**

(See letter dated 06/03/98)

**Application of Lancaster Emergency Medical Services Association,
Inc.**

For the right to begin to transport, as a common carrier by motor vehicle, persons in paratransit service, between points in the county of Lancaster, and from points in said county, to other points in Pennsylvania, and vice versa.

Hearing Cancellation

This is to inform you that the Initial Hearing on the above-captioned case previously scheduled for Friday, July 24, 1998 at 10:00 a.m. in Harrisburg, Pennsylvania has been canceled.

Presiding: **Administrative Law Judge George M. Kashi**
P. O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 783-5452
Fax: (717) 787-0481

The application will be sent to the Public Utility Commission's Bureau of Transportation & Safety for review and report to the Commission.

Please mark your records accordingly.

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

DOCKETED

JUL 28 1998

**DOCUMENT
FOLDER**

SECRETARY'S BUREAU

EEF

98 JUL 23 10 23 AM '98

489691



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

REFER TO OUR FILE

August 11, 1998

C ROBERT MAY
LANCASTER EMERGENCY MEDICAL SERVICES ASSOCIATION INC
PO BOX 4652
LANCASTER PA 17604-4652

In re: A-00114732 - Application of LANCASTER EMERGENCY MEDICAL SERVICES ASSOCIATION, INC.

DOCKETED APPLICATION DOCKET AUG 11 1998 ENTRY No. <u>72</u>

Dear Sir:

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

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

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

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

DOCUMENT
FOLDER

You are being granted an initial thirty (30) days to file verified statements. They will be due on or before September 11, 1998.

If additional time is required, it may be requested by telephone but must be followed in writing with the reasons for the extension stated. Questions about the application should be directed to Tim Zeigler at 717-783-5946.

Very truly yours,

Tim Zeigler
Technical Unit - Compliance Office
Bureau of Transportation & Safety

cc: Document Folder

LAW OFFICES OF
STEVENS & LEE
A PENNSYLVANIA PROFESSIONAL CORPORATION

PLEASE RESPOND TO HARRISBURG

September 15, 1998

Timothy Zeigler
Technical Unit - Compliance Office
Bureau of Transportation and Safety
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

DOCKETED
APPLICATION DOCKET

SEP 23 1998

ENTRY No. TZ

Re: Application of Lancaster Emergency Medical Services Association, Inc., Docket No. A-00114732

Dear Mr. Zeigler:

On behalf of my client, the Applicant, Lancaster Emergency Medical Services Association, Inc., I request an additional 30 day extension of time to file the Verified Statement of Applicant and Verified Statement(s) in Support of the Application.

Should you have any questions, please feel free to contact my office in Harrisburg.

Sincerely,

STEVENS & LEE

Kenneth Zielonis

Kenneth Zielonis, Esq.

/dle

cc: File

**DOCUMENT
FOLDER**

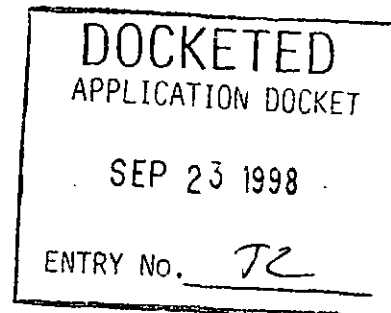
208 North Third Street, Suite 310, P.O. Box 12090, Harrisburg, PA 17108-2090 • 717-234-1250 Fax 717-234-1939
1415 Route 70 East, Suite 506, Cherry Hill, NJ 08034 • 609-354-9200 Fax 609-354-8111
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One Glenhardie Corporate Center, 1275 Drummers Lane, P.O. Box 236, Wayne, PA 19087-0236 • 610-964-1480 Fax 610-687-1384
289 North Main Street, Wilkes-Barre, PA 18702-4409 • 717-823-6116 Fax 717-823-1149



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

September 23, 1998

KENNETH ZIELONIS
ATTORNEY AT LAW
PO BOX 12090
HARRISBURG PA 17108-2090



In Re: A-00114732 - Application of Lancaster Emergency Medical Services Association, Inc.

Dear Sir:

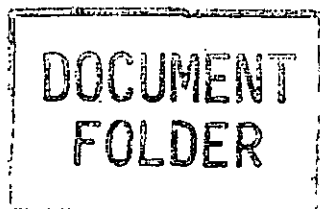
In accordance with your request of August 26, 1998 for an extension of time to file verified statements, we are granting an additional thirty (30) days for filing of statements.

Please be advised that verified statement are now due on October 13, 1998. If said statements are not filed with this office by that date we shall assume that you do not desire to pursue this matter and shall recommend to the Commission that the application be dismissed for lack of prosecution.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

Tim Zeigler
Compliance Office



LAW OFFICES OF
STEVENS & LEE
A PENNSYLVANIA PROFESSIONAL CORPORATION

PLEASE RESPOND TO HARRISBURG

October 12, 1998

COMMUNICATIONS

Timothy Zeigler
Technical Unit - Compliance Office
Bureau of Transportation and Safety
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Lancaster Emergency Medical Services Association, Inc., Docket No. A-00114732

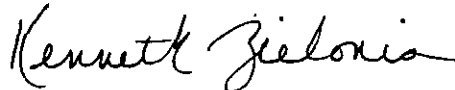
Dear Mr. Zeigler:

On behalf of my client, the Applicant, Lancaster Emergency Medical Services Association, Inc., I request an additional 30 day extension of time to file the Verified Statement of Applicant and Verified Statement(s) in Support of the Application.

Should you have any questions, please feel free to contact my office in Harrisburg.

Sincerely,

STEVENS & LEE



Kenneth Zielonis, Esq.

/dle

cc: File

DOCKETED APPLICATION DOCKET OCT 15 1998 ENTRY No. 72



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

October 15, 1998

KENNETH ZIELONIS
ATTORNEY AT LAW
PO BOX 12090
HARRISBURG PA 17108-2090

DOCKETED APPLICATION DOCKET OCT 15 1998 ENTRY No. <u>TZ</u>
--

In Re: A-00114732 - Application of Lancaster Emergency Medical Services Association, Inc.

Dear Sir:

In accordance with your request of October 12, 1998, for an extension of time to file verified statements, we are granting an additional thirty (30) days for filing of statements.

Please be advised that verified statement are now due on November 16, 1998. If said statements are not filed with this office by that date we shall assume that you do not desire to pursue this matter and shall recommend to the Commission that the application be dismissed for lack of prosecution.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

Tim Zeigler
Compliance Office

LAW OFFICES OF
STEVENS & LEE
A PENNSYLVANIA PROFESSIONAL CORPORATION

PLEASE RESPOND TO HARRISBURG

024003

98 NOV 23 AM 10:33

November 20, 1998

RECEIVED
SECRETARY'S BUREAU

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

DOCKETED APPLICATION DOCKET DEC 03 1998 ENTRY No. <u>TR</u>

Re: Application of Lancaster Emergency Medical Services Association, Inc., Docket No. A-00114732

Dear Secretary McNulty:

Please find enclosed an original and three copies of Applicant's Verified Statement and two Verified Statements in Support of Application for filing in the above captioned proceeding.

Should you have any questions or comments, please feel free to contact my office.

Sincerely,

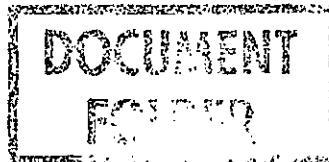
STEVENS & LEE

Kenneth Zielonis

Kenneth Zielonis, Esq.

/dle

cc: T. Zeigler
File



COMMUNICATIONS SECTION

27

Verification Statement of Applicant

re: A-00114732 - Application of Lancaster Emergency Medical Services Association, Inc.

024004

98 NOV 23 AM 10:33

1. Legal name and domicile of applicant.

Lancaster Emergency Medical Services Association
1829 Lincoln Highway East
P.O. Box 4652
Lancaster, Pa. 17604
A nonprofit corporation of the Commonwealth of Pennsylvania

RECEIVED
SECRETARY'S BUREAU

2. Identity and qualifications of person making statement for the applicant.

C. Robert May - LEMSAs Executive Director
P.O. Box 4652
Lancaster, Pa. 17604
(717) 481-4841
The LEMSAs Board of Directors has authorized

3. Whether applicant is affiliated with any other carrier, with the description of the affiliation.

LEMSAs is not affiliated with any other carrier.

4. Authority sought (if amended since application filed)

Amended operating authority attached.

5. General scope of currently authorized operations - attach a copy of any operating rights, which relate to authority sought.

LEMSAs does not currently have any such authority, this is our first application to the PUC.

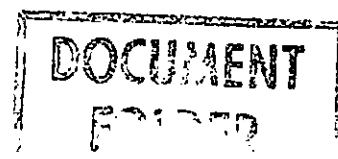
6. Duplicating authority which will result from grant of authority.

LEMSAs does not currently have any such authority.

7. Terminal facilities and communications network.

Our paratransit services are headquartered at our main EMS station and business office located at 1829 Lincoln Hwy. East, East Lampeter Twp., Lancaster County. Our station consists of three vehicle bays, a maintenance storage area, meeting room, main reception office, three administrative offices, records / report room, computer room, main lounge and kitchen area (for on duty crews) all of which is handicapped accessible. This facility covers approximately 5000 square feet of a lot which is roughly 1/2 acre in size with a 76 foot frontage on Lincoln Highway East with driveway access.

Our communications network consists of 6 phone lines, 1 fax line, and 4 data lines. Our business number is (717) 481-4841, fax (717) 481-4845, and our Transport line is (717) 392-8887. All of our vehicles are equipped with cellular phones and two way radios. Our base radio operates at 33.02 MHz. Additionally, our transport crews are all equipped with phone pagers so that they can be contacted when away from vehicle.



8. Equipment - make, model, year, owned or leased, and lessor.

1998 Ford E-250 Paratransit van, conversion by Vartanian Industries, owned by LEMSA.

Note: If this unit is unavailable, we may use one of our DOH licensed ambulances to provide paratransit services.

9. Safety program.

All drivers are required to be qualified emergency vehicle operators. This includes completion of an Emergency Vehicle Operator's Course and a check of their driving record for violations such as Reckless Driving, DUI, license suspension for points violations, etc. Each operator is then oriented to the safe operation of all of our vehicles and the safe operation of all mechanical systems specific to each vehicle. This is then documented in their training files.

Additionally, each driver completes a check of the vehicle at the start of their shift while our in house maintenance team performs weekly routine maintenance checks on all of our vehicles. Repairs, other than minor work done in house, are farmed out to certified mechanics. Complete maintenance histories are then maintained on each vehicle.

10. Service currently provided to supporting witnesses.

In addition to Paratransit services, LEMSA also provides Basic Life Support and Advanced Life Support ambulance transportation services to the supporting witnesses.

11. Type of service offered.

Passenger: Paratransit.

12. Financial data - complete the attached sheet.

See attached sheet.

13. Other information deemed pertinent.

Relationship to witnesses: Community Hospital of Lancaster and Saint Joseph Hospital are our parent organizations. Our Board of Directors consists of officers of each hospital.

LEMSA's background is rooted in prehospital emergency medical services. The organizations which merged to form LEMSA have been providing these services for over fifty years (East Lampeter Ambulance Assoc. was incorporated in August 1948). As part of our services, we provide ambulance transportation to medical facilities throughout our area. However, with insurance reimbursement rules changing rapidly, medical facilities have been forced to seek alternative means of transportation. Services who cannot offer paratransit services are more and more being excluded from transportation contracts. It is the revenue from these transportation services that allow us to continue our emergency services which, nationwide, generally operate at a deficit.

14. Statement must be notarized or verified according to instructions below.

Verification of Statement

The applicant statement may be sworn/affirmed before a notary public or contain the following verification without appearing before a notary public:

The undersigned deposes and says that he/she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that false statements herein are made subject to penalties of 18 Pa. C. S. Section 4904 relating to unsworn falsification to authorities.

Dated 10/19/98 Signature C. Robert May Name printed or typed C. Robert May

Castro EMS Association
STATEMENT OF FINANCIAL POSITION
 As of July 31, 1998

Jul 31, '98

ASSETS	
Current Assets	
Checking/Savings	
Cash	12,330
Total Checking/Savings	<u>12,330</u>
Accounts Receivable	
A/R INVALID COACH	90
Accounts Rec - ALS/BLS	19,116
Accounts Rec - Leased Services	10,109
Accounts Rec - Other	20,464
Accounts Rec-Stand-By	17,058
BEQUEST RECEIVABLE	5,000
Total Accounts Receivable	<u>71,837</u>
Other Current Assets	
Accounts Receivable - Patients	706,874
Prepaid Expenses	4,360
Total Other Current Assets	<u>711,234</u>
Total Current Assets	795,400
Fixed Assets	
Accum. Dep. Building	-7,649
Accum. Dep. MME	-113,194
Building	177,129
MME (Property, Equip.)	345,656
Total Fixed Assets	<u>401,943</u>
Other Assets	
Start Up Costs	16,181
Total Other Assets	<u>16,181</u>
TOTAL ASSETS	<u><u>1,213,524</u></u>
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	326,449
Total Accounts Payable	<u>326,449</u>
Other Current Liabilities	
Accrued Payroll Expense	6,571
DEFERRED REVENUE	76,357
Total Other Current Liabilities	<u>82,928</u>
Total Current Liabilities	409,377
Long Term Liabilities	
NOTES PAYABLE	57,712
Total Long Term Liabilities	<u>57,712</u>
Total Liabilities	467,089
Equity	
96 NET ASSETS	-262,613
97 NET ASSETS	-728,295
Net Income	-114,742
PAID-IN CAPITAL-CHL	926,042
PAID-IN CAPITAL-SJH	926,042
Total Equity	<u>746,435</u>
TOTAL LIABILITIES & EQUITY	<u><u>1,213,524</u></u>

Verified Statement in Support of Application

1. **Name and docket number of applicant being supported.**
Lancaster Emergency Medical Services Association, Inc.
Docket No. A-00114732

2. **Legal name and domicile of supporting party or firm.**
Community Hospital of Lancaster
1100 E. Orange St.
Lancaster, Pa. 17602 (Lancaster Township, Lancaster County)

3. **Identity and qualifications of person making statement for supporting party or firm.**
Cathy Williams, Vice President - Patient Services
Community Hospital of Lancaster
1100 E. Orange St.
Lancaster, Pa. 17602
(717) 397-3711
This individual is authorized to make these statements on behalf of the Community Hospital of Lancaster.

4. **General description of supporting party, organization, or operations.**
Community Hospital of Lancaster is a local hospital seeking transportation services for its patients.

5. **Volume and frequency of intended use.**
Estimated annual volume = 270 trips for 1999.

6. **Specific or representative origins and destinations.**

The following destinations are representative of the trips originating at Community Hospital of Lancaster:

Origin	Destination
Community Hosp. of Lanc., Orange St. Lancaster Twp., Lancaster County	Beverly Manor, Duke St. Lanc. City, Lanc. County
Community Hosp. of Lanc., Orange St. Lancaster Twp., Lancaster County	Manor Care, Abbeyville Rd. Lanc. Twp., Lanc. County
Community Hosp. of Lanc., Orange St. Lancaster Twp., Lancaster County	Moravian Manor, Lemon St. Lititz Borough, Lanc. County
Community Hosp. of Lanc., Orange St. Lancaster Twp., Lancaster County	Lancashire Hall, Lititz Pike Manheim Twp., Lanc. County

7. Type of service offered.

Paratransit

8. Similar application supported.

none

9. Any other information deemed pertinent.

Community Hospital of Lancaster is a Member organization of LEMSA.

Verification of Statements

The undersigned deposes and says that he / she is the person who signed the statement for the above-captioned application and that he / she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his / her knowledge information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Signature Kathleen Williams Date 10/1/98
Vice President Patient Services

Name printed or typed KATHLEEN WILLIAMS

Verified Statement in Support of Application

1. Name and docket number of applicant being supported.

Lancaster Emergency Medical Services Association, Inc.
Docket No. A-00114732

2. Legal name and domicile of supporting party or firm.

St. Joseph Hospital
250 College Ave.
Lancaster, Pa. 17603 (Lancaster City, Lancaster County)

3. Identity and qualifications of person making statement for supporting party or firm.

Roseanne Candiello, Director of Continuum of Care and Ambulatory Services
St. Joseph Hospital
250 College Ave.
Lancaster, Pa. 17603
(717) 291-8077

This individual is authorized to make these statements on behalf of St. Joseph Hospital.

4. General description of supporting party, organization, or operations.

St. Joseph Hospital is a local hospital seeking transportation services for its patients.

5. Volume and frequency of intended use.

Estimated annual volume = 750 trips for 1999.

6. Specific or representative origins and destinations.

The following samples are representative of the trips originating at SJH:

Origin	Destination	
St. Joseph Hosp., College Ave., Lancaster City, Lancaster County	LGH Health Campus, Harrisburg Pike East Hempfield Twp., Lancaster County	Return Service also needed
St. Joseph Hosp., College Ave., Lancaster City, Lancaster County	Willow Valley Glenn, Locust Ln. West Lampeter Twp., Lancaster County	
St. Joseph Hosp., College Ave., Lancaster City, Lancaster County	HealthSouth MRI, College Ave. Lancaster City, Lancaster County	Return Service also needed
St. Joseph Hosp., College Ave., Lancaster City Lancaster County	Hamilton Arms, West End Ave. Lancaster Twp., Lancaster County	

7. Type of service offered.

Paratransit

8. Similar application supported.

none

9. Any other information deemed pertinent.

St. Joseph Hospital of Lancaster is a Member organization of LEMSA.

Verification of Statements

The undersigned deposes and says that he / she is the person who signed the statement for the above-captioned application and that he / she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his / her knowledge information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Signature Rose Ann Candiello, RN, MS, NHA Date 10-13-98

Name printed or typed Rose Ann Candiello



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

REFER TO OUR FILE

December 3, 1998

KENNETH ZIELONIS
ATTORNEY AT LAW
PO BOX 12090
HARRISBURG PA 17108-2090

In re: A-00114732 - Application of Lancaster Emergency Medical Services Association, Inc.

Dear Sir:

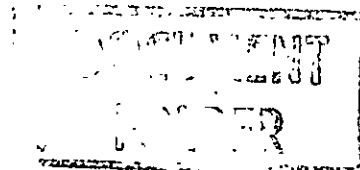
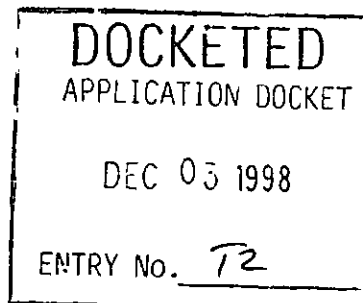
We have received the verified statement(s) and/or other information filed in connection with the above referenced application proceeding.

The record will be reviewed and a recommendation will be made for Commission consideration at public meeting. You will be advised by the Secretary as to the action taken by the Commission.

Very truly yours,

Tim Zeigler, Acting Supervisor
Compliance Office - Technical Unit
Bureau of Transportation & Safety

cc: Document Folder



LAW OFFICES OF
STEVENS & LEE
A PENNSYLVANIA PROFESSIONAL CORPORATION

PLEASE RESPOND TO HARRISBURG

December 23, 1998

Timothy Zeigler
Technical Unit - Compliance Office
Bureau of Transportation and Safety
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Lancaster Emergency Medical Services
Association, Inc., Docket No. A-00114732

Dear Mr. Zeigler:

I enclose an original and three copies of Applicant's Restrictive Amendment for filing in the above captioned proceeding. This should have been attached to the recently filed Applicant's Verified Statement. Could you please ensure that they are placed in the Commission's official file.

Should you have any questions, please feel free to contact my office in Harrisburg.

Sincerely,

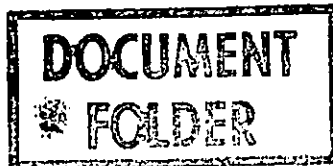
STEVENS & LEE



Kenneth Zielonis, Esq.

/dle

cc: File



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289 North Main Street, Wilkes-Barre, PA 18702-4409 • 717-823-6116 Fax 717-823-1149

Applicant hereby amends Section 10 of Applicant's Application for Motor Carrier Certificate or Permit (Application Docket No. A-00114732) to read in its entirety as follows:

"To transport, as a common carrier by motor vehicle, persons in paratransit service between points in Lancaster County, Pennsylvania and from points in said County to points in Pennsylvania and vice versa; provided that no service shall be provided within a five (5) mile radius of the center of Ephrata Borough except that Applicant may provide service within said five (5) mile radius to or from (i) Ephrata Hospital or any of its affiliates, (ii) any health care institution or continuing care facility owned or controlled by any health care institution that holds, directly or indirectly, a membership or other equity interest in Applicant, or (iii) any location to the extent required by the terms of a managed care contract between Applicant and any third party payor."