

Law Offices

# VUONO & GRAY, LLC

John A. Vuono  
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2310 Grant Building  
Pittsburgh, PA 15219-2383  
(412) 471-1800

Richard R. Wilson  
of Counsel

Facsimile  
(412) 471-4477

August 1, 2002

Re: Cranberry Limousine Services, Inc.  
Docket No. A-00114985, F. 2

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

**MAILED WITH U.S. POSTAL SERVICE  
CERTIFICATE OF MAILING FORM 3817**

RECEIVED  
BUREAU OF  
TRANSPORTATION & SAFETY  
2002 AUG - 7 AM 9:18

Dear Mr. McNulty:

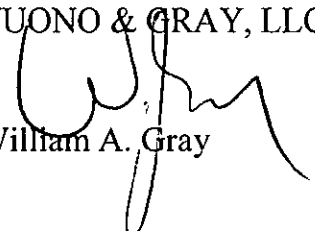
We enclose for filing with the Commission the signed original of a protest to the above application.

Please acknowledge receipt and filing of the enclosed on the duplicate copy of this letter of transmittal and return it to the undersigned in the self-addressed stamped envelope provided.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray



RECEIVED  
2002 AUG - 11 AM 11:01  
SECRETARY'S BUREAU

16

pz/22004

Enclosure

cc: Cranberry Limousine Services, Inc. (By certified mail)  
Kirk Livery, Inc.  
Star Limousine Service, Inc.

DOCUMENT  
FOLDER

Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

AUG 01 2002

DOCKET NO. A-00114985, F.2 PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU  
CRANBERRY LIMOUSINE SERVICES, INC.

PROTEST AND REQUEST  
FOR ORAL HEARING

DOCKETED  
AUG 01 2002  
12

RECEIVED  
PREVENTIVE  
& SAFETY  
2002 AUG - 7 AM 9:08  
TRANSFERRING

The motor carriers shown on Appendix A hereof (herein called protestants) protest the above application and request that the application be assigned for oral hearing and in support thereof respectfully represent as follows:

1. By this application, notice of which has been published in the Pennsylvania Bulletin, applicant seeks authority as set forth in Appendix A.
2. Protestants hold authority from this Commission at the docket numbers shown in Appendix A and the relevant portions of the authority are attached to the protest. Unless otherwise indicated in Appendix A, protestants will withdraw the protest only in the event an amendment is made which will totally eliminate the conflict between the authority sought by the application and the authority presently held by protestants.

DOCUMENT  
FOLDER

3. Approval of this application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since (a) protestants presently hold authority to provide service in the area affected by the application, (b) protestants and other existing carriers are providing adequate service to the public in the areas involved in the application, (c) there is no need for the service proposed by applicant and approval of the application will result in the diversion from existing carriers of revenue necessary to sustain their existing operations, and (d) approval of the application will adversely affect protestants and other existing carriers which have a substantial investment in facilities and equipment and are willing and able to provide service in the application area.

4. Protestants request that the application be set for oral hearing and that applicant be required to prove by competent evidence the elements of proof required by statute. If an oral hearing is held, protestants will appear and present evidence of protestants' own operations and particular interests unless this application is amended so as to eliminate those interests as set forth in this protest.

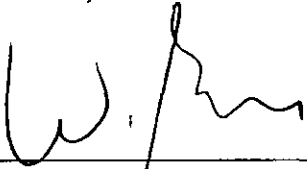
WHEREFORE, protestants request that the granting of the application be withheld; the proceeding be assigned for oral hearing with leave to protestants to participate fully therein; and applicant be required to make available at the hearing

competent witnesses for examination on all material and relevant facts bearing on the application.

Respectfully submitted,

STAR LIMOUSINE SERVICE, INC.  
KIRK LIVERY, INC.

By: \_\_\_\_\_

  
William A. Gray  
Attorney for Protestants

VUONO & GRAY, LLC  
2310 Grant Building  
Pittsburgh, PA 15219  
(412) 471-1800  
Of Counsel

Dated: August 1, 2002

/22004

Re: Cranberry Limousine Services, Inc.  
Docket No. A-00114985, F.2

APPENDIX A

SCOPE OF AUTHORITY SOUGHT:

By application published in the Pennsylvania Bulletin on July 13, 2002, applicant seeks authority to operate as a common carrier, transporting:

Persons in limousine service, between points in the  
Counties of Allegheny, Beaver and Butler.

INTEREST OF PROTESTANTS:

1. Star Limousine Service, Inc., 910 Sheridan Drive, Mars, PA 16046-9414, (714) 776-0044, holds authority at Docket No. A-0000106305. A copy of the relevant authority of this company is attached hereto. As relevant to this application, Star Limousine has authority to provide service between all points in Pennsylvania.

2. Kirk Livery, Inc., 126 McClelland Drive, Pittsburgh, PA 15236 (412) 920-4500, holds authority at Docket No. A-00109668. A copy of the relevant authority is attached hereto. As relevant to this application, Kirk Livery has authority to provide service between all points in Pennsylvania.

STAR LIMOUSINE SERVICE, INC.

Docket No. A-00106305, F. 5

To transport, as a common carrier, persons in limousine service:

(1) between points in the county of Butler, and from points in the county of Butler, to points in the county of Allegheny, and vice versa; and

(2) from points in the counties of Butler and Allegheny, to points in Pennsylvania, on and west of U.S. Highway Route 219, and return;

subject to the following condition:

That no right, power or privilege is granted to transport between points in the county of Allegheny.

**KIRK LIVERY, INC.**

**DOCKET NO. A-00109668**

To transport, as a common carrier, persons attending funerals, in limousine service, between points in the counties of Beaver, Washington and Westmoreland, and from points in the counties of Beaver, Washington and Westmoreland to points in the county of Allegheny, and vice versa.

**FOLDER 1, Am-A**

1. To transport, as a common carrier, persons, in limousine service, between points in the counties of Westmoreland, Fayette; and from said counties to points in the counties of Allegheny, Washington, Beaver, Venango, Butler, Crawford and those portions of the counties of Cambria and Somerset west of U.S. Route 219; and vice versa;
2. To transport, as a common carrier, persons, in limousine service, from points in the county of Allegheny to points in the counties of Washington, Fayette, Westmoreland, Beaver, Butler, Venango, Clarion, Crawford and those portions of the counties of Cambria and Somerset west of U.S. Route 219; and vice versa;

with the two rights immediately above subject to the following conditions:

- (1) That service from points in Westmoreland and Washington Counties to the Greater Pittsburgh International Airport in the township of Moon and Findlay, Allegheny County, and vice versa, shall be limited to service by means of six-door executive limousines equipped with luxury amenities including bar, television, communication system, etc.;
- (2) That no right, power or privilege is granted to transport persons and their baggage from points in the county of Crawford, to the Greater Pittsburgh International Airport in the townships of Moon and Findlay, Allegheny County, and vice versa; and

**FOLDER 1, Am-B**

To transport, as a common carrier, persons in limousine service, between points in the counties of Armstrong and Indiana, and from points in said counties to points in Pennsylvania, and return.

FOLDER 1, AM-C

To transport, as a common carrier, by motor vehicle, persons, attending funerals, in limousine service, between points in the county of Lawrence, and from points in said county, to points in Pennsylvania, and return.

FOLDER 1, AM-D

To transport, as a common carrier, persons, in limousine service, between points in the counties of Beaver, Cambria, Somerset and Washington, and from points in said counties, to points in Pennsylvania, and return.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the above protest and request an oral hearing upon applicant or upon applicant's attorney or representative as shown in the Pennsylvania Bulletin notice.

Dated at Pittsburgh, PA, this 1st day of August, 2002.

  
\_\_\_\_\_  
William A. Gray

/22004

Law Offices

# VUONO & GRAY, LLC

John A. Vuono  
William A. Gray  
Mark T. Vuono\*  
Dennis J. Kusturiss  
Christine M. Dolfi  
Louise R. Schrage  
*\*Also Admitted in Florida*

2310 Grant Building  
Pittsburgh, PA 15219-2383  
(412) 471-1800

Richard R. Wilson  
*of Counsel*

Facsimile  
(412) 471-4477

August 5, 2002

Re: Cranberry Limousine Services, Inc.  
Docket No. A-00114985, F. 2

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

**MAILED WITH U.S. POSTAL SERVICE**  
**CERTIFICATE OF MAILING FORM 3817**

2002 AUG -9 PM 2:16  
RECEIVED  
BUREAU OF  
SAFETY

Dear Mr. McNulty:

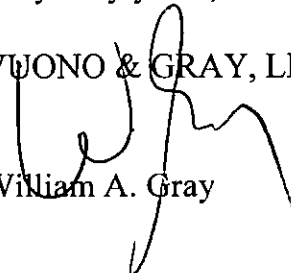
We enclose for filing with the Commission the signed original of a protest to the above application.

Please acknowledge receipt and filing of the enclosed on the duplicate copy of this letter of transmittal and return it to the undersigned in the self-addressed stamped envelope provided.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray



ms/22004

Enclosure

cc: Cranberry Limousine Services, Inc. (By certified mail)  
System of Services, Inc. t/d/b/a Fantasy Limo Leasing

SECRETARY'S BUREAU

2002 AUG -7 PM 9:15

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FOLDER

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Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED  
2002 AUG -7 PM 9:15  
SECRETARY'S BUREAU

DOCKET NO. A-00114985, F.2  
CRANBERRY LIMOUSINE SERVICES, INC.

PROTEST AND REQUEST  
FOR ORAL HEARING

**DOCKETED**  
AUG 05 2002  
TL

The motor carriers shown on Appendix A hereof (herein called protestants) protest the above application and request that the application be assigned for oral hearing and in support thereof respectfully represent as follows:

1. By this application, notice of which has been published in the Pennsylvania Bulletin, applicant seeks authority as set forth in Appendix A.
2. Protestants hold authority from this Commission at the docket numbers shown in Appendix A and the relevant portions of the authority are attached to the protest.

Unless otherwise indicated in Appendix A, protestants will withdraw the protest only in the event an amendment is made which will totally eliminate the conflict between the authority sought by the application and the authority presently held by protestants.

2002 AUG 9 PM 2:06  
SECRETARY'S BUREAU

**DOCUMENT  
FOLDER**

3. Approval of this application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since (a) protestants presently hold authority to provide service in the area affected by the application, (b) protestants and other existing carriers are providing adequate service to the public in the areas involved in the application, (c) there is no need for the service proposed by applicant and approval of the application will result in the diversion from existing carriers of revenue necessary to sustain their existing operations, and (d) approval of the application will adversely affect protestants and other existing carriers which have a substantial investment in facilities and equipment and are willing and able to provide service in the application area.

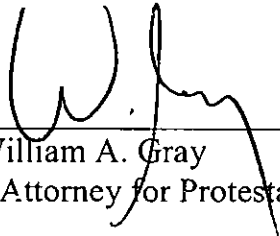
4. Protestants request that the application be set for oral hearing and that applicant be required to prove by competent evidence the elements of proof required by statute. If an oral hearing is held, protestants will appear and present evidence of protestants' own operations and particular interests unless this application is amended so as to eliminate those interests as set forth in this protest.

WHEREFORE, protestants request that the granting of the application be withheld; the proceeding be assigned for oral hearing with leave to protestants to participate fully therein; and applicant be required to make available at the hearing

competent witnesses for examination on all material and relevant facts bearing on the application.

Respectfully submitted,

SYSTEM OF SERVICES, INC.  
T/D/B/A FANTASY LIMO LEASING

By:   
William A. Gray  
Attorney for Protestants

VUONO & GRAY, LLC  
2310 Grant Building  
Pittsburgh, PA 15219  
(412) 471-1800  
Of Counsel

Dated: August 5, 2002

/22004

Re: Cranberry Limousine Services, Inc.  
Docket No. A-00114985, F.2

APPENDIX A

SCOPE OF AUTHORITY SOUGHT:

By application published in the Pennsylvania Bulletin on July 13, 2002, applicant seeks authority to operate as a common carrier, transporting:

Persons in limousine service, between points in the  
Counties of Allegheny, Beaver and Butler.

INTEREST OF PROTESTANTS:

1. System of Services, Inc., t/d/b/a Fantasy Limo Leasing, 28 Georgetown Lane, Beaver, PA 15009, (724) 775-3333, holds authority at Docket No. A-00108826. A copy of the relevant operating authority is attached hereto. As relevant to this application, System of Services, Inc. t/d/b/a Fantasy Limo has authority to provide service between all points in Pennsylvania.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the above protest and request an oral hearing upon applicant or upon applicant's attorney or representative as shown in the Pennsylvania Bulletin notice.

Dated at Pittsburgh, PA, this 5th day of August, 2002.

  
\_\_\_\_\_  
William A. Gray

/22004

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

**Public Meeting held September 28, 2000**

**Commissioners Present:**

**John M. Quain, Chairman  
Robert K. Bloom, Vice-Chairman  
Nora Mead Brownell  
Aaron Wilson, Jr.  
Terrance J. Fitzpatrick**

Application of System of Services, Inc., t/d/b/a Fantasy Limo Leasing, a corporation of the Commonwealth of Pennsylvania, for the additional right to transport, as a common carrier, by motor vehicle, persons in limousine service, between points in the county of Beaver, and from points in said county, to points in Pennsylvania, and vice versa.

A-00108826,  
F. 5

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Vuono & Gray, LLC by William A. Gray for the applicant  
Javy Enterprises, Inc., protestant, pro se.  
M. J. Unis, Inc., t/d/b/a Deluxe Limo Service, protestant, pro se.

---

**O R D E R**

**BY THE COMMISSION:**

This matter comes before the Commission on an application filed May 1, 2000. Public notice of the application was given in the Pennsylvania Bulletin of May 13, 2000. The application was protested by the two (2) above-mentioned carriers. All protests were withdrawn upon restrictive amendment as discussed below.

The now unopposed application is certified to the Commission for its decision without oral hearing. The record consists of verified statements entered by the applicant and thirteen (13) parties.

**DISCUSSION AND FINDINGS**

William Fedyski, president of System of Services, Inc., t/d/b/a Fantasy Limo Leasing (applicant or Fantasy), is authorized by the board of directors of applicant to present this statement. Applicant currently operates as a P.U.C. carrier providing call or demand, airport transfer, property and paratransit service. Its terminal facilities are located at 28 Georgetown Lane, Beaver, Beaver County. Applicant has in place a comprehensive maintenance and safety program.

The application is supported by thirteen (13) individuals residing at various points in the county of Beaver. Transportation is required between points in the county of Beaver and from points in Beaver County to Allegheny County, as well as other points in Pennsylvania.

The application was protested by two carriers. All protests were withdrawn upon a restrictive amendment providing that no service is to be rendered from the cities of Aliquippa and Ambridge and the township of Harmony, and to the facilities of Javy Enterprises, Inc. in the city of Ambridge, all in Beaver County.

**After complete review of the record, we find:**

1. Applicant seeks the additional right to provide limousine service.
2. The application was protested by two (2) carriers and all protests were withdrawn as discussed supra.
3. The application is supported by thirteen (13) parties.
4. Applicant currently provides service to the public as a call or demand, airport transfer, property and paratransit carrier.
5. Applicant has the equipment, ability and fitness necessary to render the service, as amended.
6. The evidence of record is sufficient to establish necessity for the service, as amended.
7. Approval of the application, as amended, is necessary for the accommodation and convenience of the public; **THEREFORE,**

**IT IS ORDERED:** That the application be and is hereby approved granting the following additional right:

To transport, as a common carrier, persons in limousine service, between points in the county of Beaver, and from points in said county, to points in Pennsylvania, and vice versa;

subject to the following conditions:

1. That no right, power or privilege is granted to provide service from the cities of Aliquippa and Ambridge and the township of Harmony, all located in Beaver County.
2. That no right, power or privilege is granted to provide service to the facilities of Javy Enterprises, Inc. in the city of Ambridge, Beaver County.

**IT IS FURTHER ORDERED:** That the applicant shall not engage in any transportation authorized by this order until the following is submitted to the Commission:

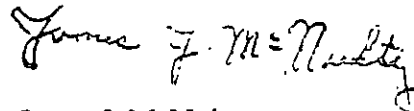
1. A tariff establishing just and reasonable rates.
2. Fine due in the amount of one thousand (\$1,000) dollars at A-00108826C0002.
3. Fine due in the amount of five hundred (\$500) dollars at A-008826C0001.
4. The 2000 assessment due in the amount of two-thousand seven-hundred six (\$2,706.00) dollars

**IT IS FURTHER ORDERED:** That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the applicant, shall not be construed as conferring more than one operating right.

**IT IS FURTHER ORDERED:** That upon compliance with the requirements hereinbefore set forth, a certificate shall issue evidencing the Commission's approval of the right to operate as above-determined.

**IT IS FURTHER ORDERED:** That in the event said applicant has not, on or before sixty (60) days from the date of the service of this order, complied with the requirements hereinbefore set forth, the application shall be dismissed without further proceedings.

**BY THE COMMISSION,**



James J. McNulty  
Secretary

(SEAL)

**ORDER ADOPTED:** September 28, 2000

**ORDER ENTERED:** OCT 02 2000