

Law Offices

VUONO & GRAY, LLC

310 Grant Street, Suite 2310

Pittsburgh, PA 15219-2383

John A. Vuono
William A. Gray
*Mark T. Vuono**
Dennis J. Kusturiss
Louise R. Vuono
William H. Stewart, III
Erica G. Wilson
Paul J. Gitnik, Of Counsel

**Also Admitted in Florida*

Telephone
412-471-1800

Facsimile
412-471-4477

www.vuonogray.com

Email Address
wgray@vuonogray.com

June 2, 2016

Re: Allegheny Medical Transport, Inc.
Docket No. A-2015-2513390

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Ms. Chiavetta:

We enclose for filing on behalf of Green's Taxi, Inc., an original and two (2) copies of a Petition for Reconsideration in connection with 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

CW/164766

Enclosure

cc: Green's Taxi, Inc. (w/enc.)

RECEIVED
2016 JUN -6 AM 11:19
PA.P.U.C.
SECRETARY'S BUREAU

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
2016 JUN -6 AM 11:20
PA.P.U.C.
SECRETARY'S BUREAU

DOCKET NO. A-2015-2513390

ALLEGHENY MEDICAL TRANSPORT, INC.

PETITION FOR RECONSIDERATION

AND NOW COMES Petitioner Green's Taxi, Inc., by its counsel, VUONO & GRAY, LLC, and files this Petition for Reconsideration stating as follows:

1. Petitioner is Green's Taxi, Inc., with offices at 8200 Noblestown Road, McDonald, PA 15057.
2. Petitioner filed a protest to the application filed by Allegheny Medical Transport, a copy of which is attached hereto as Exhibit "A".
3. Petitioner mailed its protest to the Commission with a Certificate of Mailing Form 3817, which was stamped by the United States Postal Service in Pittsburgh on December 4, 2015. A true and correct copy of the letter transmitting the protest and the stamped U. S. Postal Receipt Form 3817 is attached hereto as Exhibit "B".
4. Petitioner/Protestant served the applicant with the protest that it filed by Certified mail on December 4, 2015. A true and correct copy of the certified mail receipt stamped by the United States Postal Service is attached hereto as Exhibit "C".

5. On December 7, 2015, Petitioner/Protestant served Interrogatories on the Applicant and filed a Certificate of Service of Interrogatories on the Commission. A true and correct copy of the Certificate of Service filed by the Protestant is attached hereto as Exhibit "D".

6. Because of the fact that the Applicant did not answer its Interrogatories, the Petitioner/Protestant on March 9, 2016 filed with the Commission a Motion to Compel, a true and correct copy of which is attached hereto as Exhibit "E".

7. On March 16, 2016, Secretary Chiavetta sent to the attorney for the Petitioner/Protestant a letter requesting a Verification to attach to the Motion to Compel. A true and correct copy of Secretary Chiavetta's letter is attached hereto as Exhibit "F".

8. By letter dated March 23, 2016, the attorney for the Petitioner/Protestant sent to Secretary Chiavetta an executed Verification pursuant to her letter dated March 16, 2016, a true and correct copy of which is attached hereto as Exhibit "G".

9. Despite the fact that the Petitioner/Protestant filed a valid protest to this application, the Commission by Secretarial Letter dated April 11, 2016 granted the application, subject to compliance with the insurance and tariff filing requirements. A true and correct copy of the Commission's Secretarial Letter dated April 11, 2016 is attached hereto as Exhibit "H". A copy of the Secretarial Letter was not served on the Petitioner/Protestant, which was not aware of the Secretarial Letter having been issued.

10. A Certificate of Public Convenience was issued to the Applicant on May 18, 2016. A copy of this Certificate of Public Convenience along with the Commission's letter of transmittal is attached hereto as Exhibit "I". The Petitioner/Protestant was not served with a copy of the Certificate of Public Convenience or the letter transmitting the Certificate.

11. The Petitioner/Protestant first became aware of the fact that this application was handled as an unopposed application and that a Secretarial Letter and Certificate of Public Convenience was issued by a routine review of the Commission's website involving this application by the attorney for the Petitioner/Protestant.

12. Since the Petitioner/Protestant filed a valid protest to this application, and since the Commission's staff was aware or should have been aware that this application was an opposed application, the application should not have been granted by Secretarial Letter and the Certificate of Public Convenience should not have been issued.

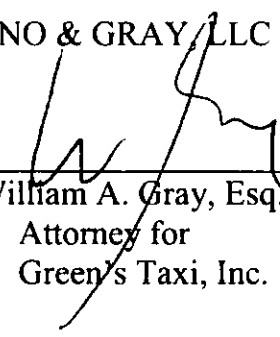
13. The Commission should grant this Petition for Reconsideration and should rescind the Secretarial Letter approving the application and the Certificate of Public Convenience and should transfer this application to the Office of Administrative Law Judges for scheduling a hearing in connection with this application.

WHEREFORE, Petitioner, Green's Taxi, Inc., by its attorneys, Vuono & Gray, LLC, respectfully requests that the Commission grant this Petition for Reconsideration, rescind the Secretarial Letter dated April 11, 2016 and the Certificate of Public Convenience dated May 18, 2016 and transfer this application to the Office of Administrative Law Judges to schedule a hearing.

Respectfully submitted,

VUONO & GRAY, LLC

By:



William A. Gray, Esq.
Attorney for
Green's Taxi, Inc.

VUONO & GRAY, LLC
310 Grant Street, Suite 2310
Pittsburgh, PA 15219
(412) 471-1800

Dated: June 2, 2016
/164760

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A-2015-2513390

ALLEGHENY MEDICAL TRANSPORT, INC.

PROTEST AND REQUEST
FOR ORAL HEARING

The motor carrier shown on Appendix A hereof (herein called protestant) protests the above application and requests that the application be assigned for oral hearing and in support thereof respectfully represents 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. Protestant holds authority from this Commission at the docket number shown in Appendix A and the relevant authority is attached to the protest. Unless otherwise indicated in Appendix A, the protestant will withdraw the protest only in the event an amendment is made which will totally eliminate the interest of the protestant.
3. Approval of this application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since (a) protestant presently holds authority to provide service in the area affected by the application, (b) protestant 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

Exhibit "A"

to sustain their existing operations, (d) the applicant does not possess the technical and financial ability to provide the proposed service and lacks a propensity to operate safely and legally, and (e) approval of the application will adversely affect protestant 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.

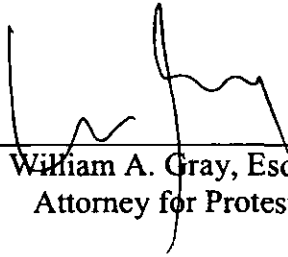
4. Protestant requests that the application be set for oral hearing and that applicant be required to prove by competent evidence the elements of proof required by statute. If an oral hearing is held, protestant will appear and present evidence in opposition to the grant of the application unless the application is amended so as to eliminate the interest as set forth in this protest.

WHEREFORE, protestant requests that the granting of the application be withheld; the proceeding be assigned for oral hearing with leave to protestant 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,

GREEN'S TAXI, INC.

By: _____


William A. Gray, Esq.
Attorney for Protestant

VUONO & GRAY, LLC
2310 Grant Building
Pittsburgh, PA 15219-2383
(412) 471-1800

Dated: December 4, 2015
/158232

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 4th day of December, 2015.



William A. Gray

/158232

Re: Allegheny Medical Transport, Inc.
Docket No. A-2015-2513390

APPENDIX A

SCOPE OF AUTHORITY SOUGHT:

By application published in the Pennsylvania Bulletin on November 28, 2015
applicant seeks authority to operate as a common carrier, transporting:

In paratransit service, from points in the Counties of
Allegheny and Washington, to points in Pennsylvania, and
return.

INTEREST OF PROTESTANTS:

Green's Taxi, Inc., 8200 Noblestown Road, McDonald, PA 15057, (724) 746-
1377, holds authority at Docket No. A-00115729. A copy of the relevant paratransit
authority of Green's Taxi, Inc. is attached hereto. As relevant to this application, Green's
Taxi, Inc. can provide service from points in Allegheny and Washington Counties.

GREEN'S TAXI, INC.

Certificate No.A-00115729, F. 4

Paratransit - Pa. P.U.C. No. 1

GREEN'S TAXI, INC.

Common Carrier by Motor Vehicle
Persons in Paratransit Service
Naming Rules and Regulations
Governing the Transportation of Persons
as a Common Carrier by Motor Vehicle
in Pennsylvania

OPERATING AUTHORITY

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

- (1) between points in the county of Washington, and from points in said county, to points in Pennsylvania, and return; and
- (2) from points in the county of Allegheny, to other to points in Pennsylvania, and return.

Official Filed Tariff

Issued: January 9, 2004

Effective: January 10, 2004

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

ISSUED BY:

Green's Taxi, Inc.
Thomas W. Bruce, President
8200 Noblestown Road
McDonald, PA 15057
(724) 926-7200

RECEIVED

JAN - 9 2004

BUREAU OF
TRANSPORTATION & SAFETY

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

Public Meeting held December 5, 2013

Commissioners Present:

**Robert F. Powelson, Chairman
John F. Coleman, Jr., Vice Chairman
James H. Cawley
Pamela A. Witmer
Gladys M. Brown**

Application of Green's Taxi, Inc., a corporation of the Commonwealth of Pennsylvania, for amendment to its common carrier certificate, which grants the right, to transport, as a common carrier, by motor vehicle, persons in paratransit service: (1) between points in the county of Washington, and from points in said county, to points in Pennsylvania, and return; and (2) from points in the county of Allegheny, to other points in Pennsylvania, and return: SO AS TO PERMIT the transportation of persons in paratransit service, between points in the county of Allegheny.

A-00115729
A-2013-2348819

ORDER

BY THE COMMISSION:

This matter comes before the Commission on an application filed February 14, 2013. Public notice of the application was given in the *Pennsylvania Bulletin* on May 25, 2013, 2013, with protests due to be filed by June 10, 2013. No protests were filed. The record consists of the application, the applicant's verified statements, and nine statements in support of the application.

DISCUSSION AND FINDINGS

Green's Taxi, Inc., (applicant) has operated as a certificated carrier since October 6, 1999, and holds authority for paratransit, call or demand, group and party (11-15), and group and party (16 or greater). Applicant will operate from its previously approved facilities and will continue to utilize its previously approved, safety, hiring, and maintenance policies. The applicant's present compliment of staff and equipment will continue to be utilized in the expanded operations and will be covered under the applicant's existing insurance policy.

The Applicant's balance sheet dated December 31, 2012, shows assets of \$147,910, and \$45,628 in liabilities. Applicant has a net worth of \$102,282.

The applicant has provided statements of support from nine qualifying parties, which represent numerous potential clients within the applicant's proposed operating area.

A review of the record before us indicates that the Applicant possesses the technical expertise, experience, facilities, sufficient capital and other resources necessary to provide the proposed service.

The Applicant is hereby advised of its obligation to familiarize itself with the requirements of 52 Pa. Code as applicable to the operation of a common carrier as authorized by this Order. Applicant is further advised that failure to comply with all applicable requirements may subject the carrier to penalties, including fines, suspension of operating rights or cancellation of its authority. Title 52 of the Pa. Code is available online at www.pacode.com.

After complete review of the record, we find:

1. Applicant seeks the additional right, to begin to transport, as a common carrier, by motor vehicle, persons in paratransit service, between points in the county of Allegheny.
2. No protests were filed.
3. Applicant has provided statements of support from nine qualifying parties.
4. Applicant has the equipment, ability and fitness necessary to render the service as amended.
5. The evidence of record is sufficient to establish necessity for the service as amended.
6. Approval of the application 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 right:

To transport, as a common carrier, by motor vehicle, persons in paratransit service, between points in the county of Allegheny.

Law Offices

VUONO & GRAY, LLC

310 Grant Street, Suite 2310

Pittsburgh, PA 15219-2383

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www.vuonogray.com

Email Address
wgray@vuonogray.com

December 4, 2015

Re: Allegheny Medical Transport, Inc.
Docket No. A-2015-2513390

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Ms. Chiavetta:

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

as/158233

Enclosure

cc: Allegheny Medical Transport, Inc. (by Certified Mail)
Green's Taxi, Inc.

Exhibit "B"



**UNITED STATES
POSTAL SERVICE**

**Certificate Of
Mailing**

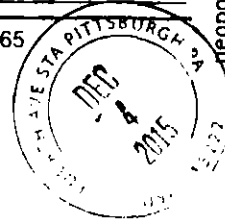
To pay fee, affix stamps or
meter postage here.

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing.
This form may be used for domestic and international mail.

From: Vvono & Gray, LLC
310 Grant Street, Suite 2310
Pittsburgh PA 15219-2383
Re: _____

To: Rosemary Chavetta Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg PA 17105-3265

PS Form 3817, April 2007 PSN 7530-02-000-9065



\$01.35⁰

US POSTAGE



ZIP 15219
041L11242930

repostSM
12/04/2015

7015 1730 0001 2999 5425

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®

Certified Mail Fee	\$
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$



Postage	\$
Total Postage and Fees	\$

Sent To
Abraham medical transport, inc
 Street and Apt. No., or PO Box No.
105 Westland Drive
 City, State, ZIP+4®
Coraopolis, PA 15108

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Exhibit "C"

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A-2015-2513390

ALLEGHENY MEDICAL TRANSPORT

MOTION TO COMPEL

Green's Taxi, Inc. (herein referred to as protestant), by its counsel, VUONO & GRAY, LLC, submits this Motion to Compel and requests that the Commission issue an order requiring the applicant to answer the Interrogatories filed by the protestant by the close of business on March 23, 2015, or face possible sanctions, including dismissal of the application. In support of the Motion, protestant submits as follows:

1. Protestant served Interrogatories on the applicant on December 7, 2015, as set forth in the Certificate of Service filed with the Commission, which is attached to this Motion as Appendix 1.
2. Protestant's Interrogatories requested information pertinent to the issues of fitness and need for service. A copy of protestant's Interrogatories is attached to this Motion as Appendix 2.
3. The applicant did not file timely objections to protestant's Interrogatories.
4. Protestant's Interrogatories demanded that the applicant file and serve full

Exhibit "E"

and complete written answers to each interrogatory within twenty (20) days after the date of service pursuant to 52 Pa. Code §5.342.

5. The applicant has not provided answers to the Interrogatories attached hereto as of this date.

6. Protestant's counsel sent a letter to the applicant dated January 27, 2016, indicating that Answers to Interrogatories had not been received and demanding that the Answers be provided by February 5, or the protestant would have no alternative but to file a motion for sanctions. A copy of this letter is attached to this Motion as Appendix 3.

7. Protestant's counsel sent a letter to the applicant dated February 16, 2016, indicating that answers to Interrogatories had not been received and demanding that the answers be provided by February 26, or the protestant would have no alternative but to file a motion to compel. A copy of this letter is attached to this Motion as Appendix 4.

8. Protestant's counsel sent a letter to the applicant dated March 7, 2016, indicating that since the applicant had still not answered the Interrogatories and Request for Production of Documents, a Motion to Compel would be filed without further notice. A copy of this letter is attached to this Motion as Appendix 5.

9. The information requested in the Interrogatories is sought to be discovered in order to permit the protestant to prepare for the hearings and to properly cross-examine witnesses for the applicant.

10. Protestant hereby requests that the applicant be directed to answer the Interrogatories by no later than the close of business on March 23, 2016 or face possible sanctions, including dismissal of the application.

WHEREFORE, Protestant respectfully requests this Commission enter an Order compelling the applicant to provide answers to protestant's Interrogatories by delivering the answers to protestant's counsel by no later than the close of business on March 23, 2016 or face possible sanctions including dismissal of the application.

Respectfully submitted,

VUONO & GRAY, LLC

By: 

William A. Gray, Esq.
Attorney for
Green's Taxi, Inc.

VUONO & GRAY, LLC
310 Grant Street, Suite 2310
Pittsburgh, PA 15219
(412) 471-1800

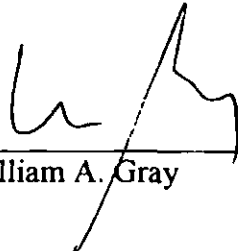
Dated: March 9, 2016

/161115

CERTIFICATE OF SERVICE

William A. Gray, attorney for Protestants, hereby certifies that on the 9th day of March, 2016 he did serve a true and correct copy of the foregoing Motion to Compel upon applicant's counsel by first class mail, postage prepaid, at its address as follows:

Allegheny Medical Transport
105 Westwind Drive
Moon, PA 15108



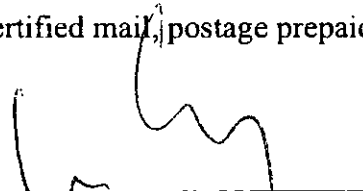
William A. Gray

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE:)
)
Application of) Docket No. A-2015-2513390
ALLEGHENY MEDICAL TRANSPORT, INC.)

CERTIFICATE OF SERVICE

William A. Gray, attorney for Protestant, Green's Taxi, Inc., hereby certifies that on the 7th day of December, 2015, he did serve the original and two (2) true and correct copies of Interrogatories Directed to the Applicant upon Allegheny Medical Transport, Inc., 105 Westwind Drive, Moon, PA 15108, by certified mail, postage prepaid.



William A. Gray, Esq.
Attorney for Protestant

VUONO & GRAY, LLC
310 Grant Street, Suite 2310
Pittsburgh, PA 15219
412-471-1800

/158236

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A-2015-2513390

APPLICATION OF
ALLEGHENY MEDICAL TRANSPORT, INC.

INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO APPLICANT

Protestant, Green's Taxi, Inc., by its attorneys, submits the following Interrogatories to Allegheny Medical Transport, Inc. ("Applicant") and demands that the Applicant file and serve full and complete written answers to each Interrogatory under oath with twenty (20) days after the date of the service hereof pursuant to 52 Pa. Code §5.342.

The request for information, as set forth in these Interrogatories, shall be of a continuing nature, with the understanding that it shall be the responsibility of Applicant to furnish updated responses to the questions herein, up to and including the time at which the hearing on the merits of this case is held.

INTERROGATORIES

1. Identify each and every motor vehicle presently owned by the Applicant or leased by the Applicant from another party, which it proposes to use in providing the paratransit service sought by this application. For each vehicle, indicate the owner, the date of manufacture, mileage, serial number, seating capacity, type of vehicle, special features on the vehicle, and the date when the vehicle was acquired, either by purchase or lease, by the Applicant.

ANSWER:

2. Identify each and every facility or location where the Applicant will domicile equipment which it intends to utilize in performing the service sought by this application.

ANSWER:

3. Identify the name and address of each witness the Applicant expects to call in this case. If applicable, please provide the name of the company, group or entity the witness represents and the subject matter of his/her expected testimony, including any testimony pertaining to potential use of the Applicant's proposed service.

ANSWER:

4. Identify each exhibit the Applicant intends to offer into evidence in this case. Please attach copies of these exhibits to your response herein.

ANSWER:

5. Identify each and every formal and/or informal complaint against the Applicant filed by or with the Pennsylvania Public Utility Commission since January 1, 2013. For each complaint, state: date of complaint; nature of the complaint; code section alleged to have been violated; date of trip(s); origin of trip(s); destination of trip(s) and how the complaint was resolved. Please attach to your answers copies of each formal and/or informal complaint, any and all responses submitted by the applicant, and any orders or other documents issued by the Public Utility Commission relating to each formal and/or informal complaint.

ANSWER:

6. Is the Applicant affiliated in any way with any other entity licensed by the Public Utility Commission? If so, identify the entity and the affiliation.

ANSWER:

7. Identify each instance since January 1, 2014 where the Applicant has transported persons in paratransit service from points in Allegheny and/or Washington Counties to points in Pennsylvania. For each such instance, provide the following information: name of person transported; date of trip; origin of trip; destination of trip; and payment received.

ANSWER

8. Has the Applicant or any officer or owner or employee of the Applicant been convicted of and/or pled guilty to a felony or crime of moral turpitude? If the answer is in the affirmative, then for each such crime or violation please:

- a. identify each offense for which charged;
- b. the date on which the offense occurred; and
- c. the disposition by any court or tribunal.

ANSWER:

9. State whether the Applicant has ever been contacted, verbally or in writing, by the Public Utility Commission or its agents or employees questioning any transportation services provided by the Applicant. If so, state when said contact was made and state in detail the nature of the specifics involved.

ANSWER:

Dated: December 7, 2015

By: 

William A. Gray, Esq.
VUONO & GRAY, LLC
310 Grant Street, Suite 2310
Pittsburgh, PA 15219-2383
Attorney for Protestant

/158234

VERIFICATION

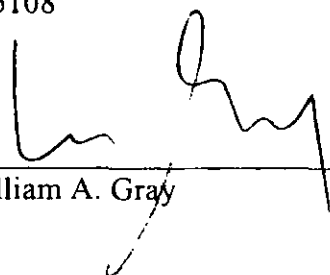
I verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Dated: _____

CERTIFICATE OF SERVICE

William A. Gray, attorney for Protestant, hereby certifies that on the 7th day of December, 2015, he did serve the original and two (2) true and correct copies of the foregoing Interrogatories upon Applicant by first class mail, postage prepaid, at the address as set forth below:

Allegheny Medical Transport, Inc.
105 Westwind Drive
Moon Township, PA 15108



William A. Gray

Law Offices

VUONO & GRAY, LLC

310 Grant Street, Suite 2310

Pittsburgh, PA 15219-2383

John A. Vuono
William A. Gray
*Mark T. Vuono**
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Paul J. Gitnik, Of Counsel

**Also Admitted in Florida*

Telephone
412-471-1800

Facsimile
412-471-4477

www.vuonogray.com

Email Address
wgray@vuonogray.com

January 27, 2016

Re: Allegheny Medical Transport, Inc.
Docket No. A-2015-2513390

Allegheny Medical Transport, Inc.
105 Westwind Drive
Moon, PA 15108

Dear Ladies and Gentlemen:

We served Interrogatories and Request for Production of Documents on your company on January 4. Your answers are now overdue. Please provide us with your answers by no later than February 5. If we do not have your answers by that date, we will have no alternative but to file a motion for sanctions with the PUC.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray

mm/159939

cc: Green's Taxi, Inc.

Law Offices

VUONO & GRAY, LLC

310 Grant Street, Suite 2310

Pittsburgh, PA 15219-2383

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wgray@vuonogray.com

February 16, 2016

Re: Allegheny Medical Transport, Inc.
Docket No. A-2015-2513390

Allegheny Medical Transport, Inc.
105 Westwind Drive
Moon, PA 15108

Dear Ladies and Gentlemen:

We have still not received your Answers to our Interrogatories and Request for Production of Documents. Please provide us with your Answers by no later than next Friday, February 26. If we have not received your Answers by that date, we intend to file a Motion to Compel with the Public Utility Commission.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray

mm/160522

cc: Green's Taxi, Inc.

Law Offices

VUONO & GRAY, LLC

310 Grant Street, Suite 2310

Pittsburgh, PA 15219-2383

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412-471-4477

www.vuonogray.com

Email Address
wgray@vuonogray.com

March 7, 2016

Re: Allegheny Medical Transport, Inc.
Docket No. A-2015-2513390

Allegheny Medical Transport, Inc.
105 Westwind Drive
Moon, PA 15108

Dear Ladies and Gentlemen:

You still have not provided us with your Answers to Interrogatories and Request for Production of Documents. We therefore intend to file a Motion to Compel with the Public Utility Commission without further notice.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray

mm/161113

cc: Green's Taxi, Inc.



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET 2ND FLOOR, HARRISBURG, PA 17120

March 16, 2016

IN REPLY PLEASE
REFER TO OUR FILE NUMBER
A-2015-2513390

**WILLIAM A GRAY ESQ
VUONO & GRAY LLC
310 GRANT STREET STE 2310
PITTSBURGH PA 15219-2383**

Dear Mr. Gray:

We are returning your Motion to Compel of Green's Taxi Inc to you because it is required for us to have an original signature and date on the Verification. Please sign in ink as indicated by the tab stating 'Sign Here' and return to the address listed at the top of this letter within 10 days.

Once we receive your Response with your original signature we will be able to process as needed. If you do not return within 10 days your filing will be considered unfiled.

Thank you for your attention to this matter.

Very truly yours,

Rosemary Chiavetta
Secretary

Enclosures
DJ

Exhibit "F"

Law Offices

VUONO & GRAY, LLC

310 Grant Street, Suite 2310
Pittsburgh, PA 15219-2383

John A. Vuono
William A. Gray
*Mark T. Vuono**
Dennis J. Kusturiss
Louise R. Vuono
William H. Stewart, III
Erica G. Wilson
Paul J. Gitnik, Of Counsel

**Also Admitted in Florida*

Telephone
412-471-1800

Facsimile
412-471-4477

www.vuonogray.com

Email Address
wgray@vuonogray.com

March 23, 2016

Re: Allegheny Medical Transport, Inc.
Docket No. A-2015-2513390

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Dear Ms. Chiavetta:

We are enclosing the executed Verification pursuant to your letter dated March 16 in connection with the above application, a copy of which is also enclosed.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray

mm/161773
Enclosure

Exhibit "G"

VERIFICATION

I verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.



A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above a solid horizontal line.

Dated: 3/21/14

**PLEASE SIGN
& DATE**

RECEIVED
2016 MAR 14 2:10:55
SECRETARY'S BUREAU



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

April 11, 2016

IN REPLY PLEASE
REFER TO OUR FILE

A-6416861
A-2015-2513390

ALLEGHENY MEDICAL TRANSPORT INC
105 WESTWIND DRIVE
MOON PA 15108

**Re: Application of Allegheny Medical Transport, Inc., 126 Sygan Road, McDonald,
Allegheny County, Pennsylvania 15057, (412) 257-2262.**

To Whom It May Concern:

The purpose of this Letter is to advise you that your application has been reviewed and approved by the Pennsylvania Public Utility Commission (Commission). However, before you begin operations, you must file with the Commission all of the information listed in the paragraphs below. **You cannot operate under the approved motor carrier rights set forth in this Letter until all of the information listed below is filed with, and approved by, the Commission.** Once the information listed below is received and approved by the Commission, you will receive a Certificate of Public Convenience, with PUC No. A-6416861, which authorizes you to begin operating under the motor carrier rights set forth in this Letter.

(a) An acceptable **Form E** filed by an insurance company which is evidence of bodily injury and property damage liability insurance. **Your insurance company must file a Form E with the exact name of the applicant as it appears on this Letter – Allegheny Medical Transport, Inc. You should also advise your insurance company to place the following numbers at the top of your insurance form – A-2015-2513390 and A-6416861.**

(b) An acceptable **tariff** establishing just and reasonable rates. Instructions for filing of a tariff can be found at: www.puc.pa.gov/general/onlineforms/pdf/Initial_Tariff_Instructions.pdf

Upon issuance of a Certificate of Public Convenience you are granted the right to operate as follows:

To transport, as a common carrier, by motor vehicle, person in paratransit service, from points in the counties of Allegheny and Washington, to points in Pennsylvania, and return.

Exhibit "H"

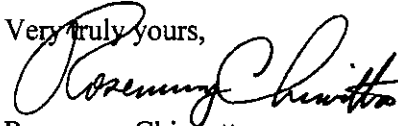
FAILURE TO COMPLY WITH ANY PROVISION OF THIS LETTER WITHIN SIXTY (60) DAYS OF THE DATE OF THIS LETTER WILL RESULT IN THE DISMISSAL OF THE APPLICATION AND REQUIRE THE FILING OF A NEW APPLICATION AND FILING FEE.

If you have not previously submitted a copy of a current satisfactory safety rating from the U.S. Department of Transportation or another state with safety regulations comparable to Pennsylvania, you must demonstrate safety fitness by completing a Safety Fitness Review which will be scheduled by a PUC enforcement officer within 180 days of the date your certificate of public convenience is issued/entered. **Failure to submit to the Safety Fitness Review will result in the cancellation of your certificate.** An overview of the safety regulations for carriers of people, property, and household goods between points in Pennsylvania can be found on the PUC's Website: www.puc.pa.gov/general/onlineforms/pdf/safety_fitness_compliance.pdf

You should become familiar with the requirements of 52 Pa. Code as applicable to the operation of a common carrier as authorized by this grant of authority. Any change in address of ***Allegheny Medical Transport, Inc.*** must be reported to the Commission by filing a Change of Address Form. This form can be found on the Commission's website at: www.puc.pa.gov/general/onlineforms/pdf/MC_Address_Change.pdf Failure to comply with all applicable requirements may subject the carrier to penalties, including fines, suspension of operating rights or cancellation of authority. Title 52 of the Pennsylvania Code may be accessed at www.pacode.com.

If you are dissatisfied with the resolution of this matter, you may, as set forth in 52 Pa. Code §5.44, file a petition with the Commission within twenty (20) days of the date of this Letter.

Very truly yours,



Rosemary Chiavetta
Secretary

Contact: Insurance (717-787-1227)
Tariff (717-787-1227)
Safety (717-783-5011)



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265
May 18, 2016

IN REPLY PLEASE
REFER TO OUR FILE

A-6416861
A-2015-2513390

**ALLEGHENY MEDICAL TRANSPORT INC
105 WESTWIND DRIVE
MOON PA 15108**

Re: Application of Allegheny Medical Transport, Inc., 126 Sygan Road, McDonald, Allegheny County, Pennsylvania 15057, (412) 257-2262. To transport, as a common carrier, by motor vehicle, person in paratransit service, from points in the counties of Allegheny and Washington, to points in Pennsylvania, and return. A-2015-2513390

To Whom It May Concern:

The records of the Commission show that the applicant has complied with the necessary requirements.

Enclosed, is the CERTIFICATE OF PUBLIC CONVENIENCE evidencing the Commission's approval of the right to operate. The number on the Certificate, which is also the first A# at the top of this page, is the PA P.U.C. No. which should be used for identification markings on the vehicle(s).

Certificate holder is advised to become familiar with the requirements of 52 Pa. Code. Failure to comply with all applicable requirements may subject the carrier to penalties, including fines suspension of operating rights or cancellation of authority. Title 52 of the Pennsylvania Code may be accessed on the World Wide Web at www.pacode.com.

Kindly attach the enclosures to the compliance order previously issued and mailed to you.

Very truly yours,

Rosemary Chiavetta
Secretary

NW

Exhibit "I"

PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN THE MATTER OF : A-6416861

Application of Allegheny Medical Transport, Inc., 126 Sygan Road, McDonald, Allegheny County, Pennsylvania 15057, (412) 257-2262. To transport, as a common carrier, by motor vehicle, person in paratransit service, from points in the counties of Allegheny and Washington, to points in Pennsylvania, and return. A-2015-2513390

EFFECTIVE DATE: May 18, 2016

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval to operate.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 18th day, of May, 2016.



Secretary

VERIFICATION

I verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.



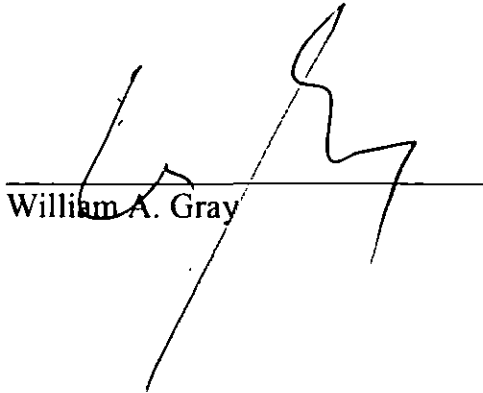
William A. Gray, Esq.

Dated: 6-2-16

RECEIVED
2016 JUN -6 AM 11:21
PA. P.U.C.
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

William A. Gray, attorney for Protestants, hereby certifies that on the 2nd day of June, 2016 he did serve a true and correct copy of the foregoing Motion to Compel upon applicant's counsel by first class mail, postage prepaid, at its address as follows:



William A. Gray

RECEIVED

2016 JUN -6 AH11:21

PA.F.U.C.
SECRETARY'S BUREAU

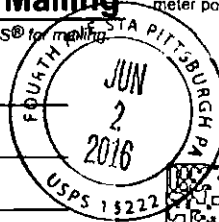


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From: Vono & Gray, LLC
310 Grant Street, Suite 2310
Pittsburgh PA 15219-2383
Re: Alleg Med



To: Rosemary Chivetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265



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Law Offices

VUONO & GRAY, LLC

310 Grant Street, Suite 2310
Pittsburgh, PA 15219-2383

TO:

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

PRIORITY
★ MAIL ★



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Label 107R, July 2013