

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement

V.

Sabine U Jacobs
437 Kathleen Street
Pittsburgh, PA 15211

DOCKET NO. C-2016-2544673

RECEIVED

JUN - 6 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

ANSWER TO COMPLAINT

I, Sabine U Jacobs, Pro Se Respondent, am a permanently disabled individual suffering from Muscular Dystrophy and in answer to the Complaint against me I represent the following:

1. That I maintain no place of business, nor did I engage in "*holding out to provide passenger service between points in Pennsylvania*" as erroneously alleged in the Pennsylvania Public Utility Commission Complaint against me.

2. The Complaint erroneously alleges that my vehicle had a "taxi dome light" on the roof, and that "dome lights are only permitted on vehicles operated by call and demand carriers". The Complaint alleges that a dome light on the roof "violated 52 Pa. Code §29.314(d)" which does not forbid a dome light on a vehicle. The statute, instead of forbidding dome lights for any other purposes, is specifically limited to only requiring that "*vehicles operated by call and demand carriers must have a dome light affixed to the roof of the vehicle. The dome light shall be visible from a distance of 100 feet from the front and rear of the vehicle. The dome light shall be illuminated only when a customer does not occupy the vehicle.*" 52 Pa. Code §29.314(d) Such a statutory requirement for "call and demand carriers" does not then necessarily constitute a legal prohibition against roof dome lights for other purposes such as pizza delivery, driver ed, etc.

3. The Complaint's allegation, without any requisite basis in fact or statute, is based exclusively on the presumption that any vehicle with a roof dome light, which while clearly not prohibited by the erroneously cited statute referenced in paragraph #2 above, nonetheless must necessarily be engaging in illegally "*holding out to provide passenger service between points in Pennsylvania*", regardless of what is actually inscribed on the roof dome light or why it's displayed.

4. In lieu of actual proof, the Complaint offers only pure supposition, based on a legal dome light, that I was "*holding out to provide passenger service between points in Pennsylvania*".

WHEREFORE, inasmuch as the Complaint demonstrably offers no proof whatsoever of an actual violation of the law, I respectfully request that the Complaint be appropriately withdrawn or dismissed. Alternatively, in the absence of such a proper withdrawal or dismissal, I hereby respectfully request a hearing in the matter.

Respectfully,

Sabine U. Jacobs
Sabine U Jacobs, Pro Se Respondent

VERIFICATION

I, Sabine U Jacobs, Pro Se Respondent, hereby state that the facts above set forth in this Answer to Complaint are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: 6-6-2016

Sabine U. Jacobs
Sabine U Jacobs, Pro Se Respondent

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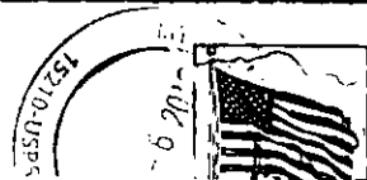
Sabine U. Jacobs
437 Kathleen Street
Pittsburgh, PA 15211

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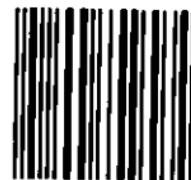


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Rosemary Chiavetta, Secretary
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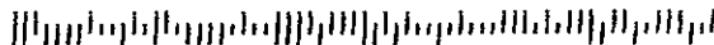


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