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Hours by Appointment Only at:
300 Mt. Lebanon Blvd.
Suite 220-A
Pittsburgh, PA 15234

June 7, 2016

Re: B & M Limousine Services, Inc.
Docket A-2016-2544790

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

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PA P.U.C.
SECRETARY'S BUREAU

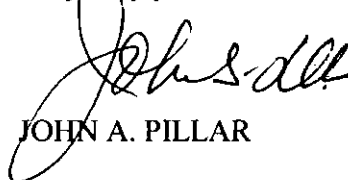
Dear Secretary Chiavetta:

Enclosed is a protest filed on behalf of Byers Taxi Service, Inc. to the above-captioned application.

A copy of this protest has been served on applicant's representative in accordance with the Commission's Rules of Practice.

Please acknowledge receipt of the enclosures on the duplicate of this letter of transmittal and return it in the stamped, self-addressed envelope provided.

Very truly yours,



JOHN A. PILLAR

sw

Enclosures

cc: Deborah L. Roscioli, Esq.
Byers Taxi Service, Inc.

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re: Application of)
B & M LIMOUSINE) Docket A-2016-2544790
SERVICES, INC.)

JUN 9 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PROTEST

In accordance with the Rules of Practice of the Pennsylvania Public Utility Commission, the carrier named herein desires to protest the above application and, in support thereof, states as follows.

1. The scope of authority sought in the application as published in the Pennsylvania Bulletin of May 28, 2016 is attached hereto as Appendix "A".

2. The name and address of the protestant are set forth in Appendix "B" hereto.

3. The name, address and telephone number of protestant's attorney:

JOHN A. PILLAR, ESQ.
150 Green Commons Drive
Pittsburgh, PA 15243
412-343-0970

4. Protestant holds authority in conflict with this application as summarized in Appendix "B" attached hereto.

5. Protestant is presently providing service in the application area and/or is willing and able to provide such service. To the extent of protestant's authority, there is no need or demand for additional service and the proposed service is not necessary or proper for the service, accommodation, convenience or safety of the public. Protestant reserves the right to present evidence of destructive competition and/or adverse impact which would be contrary to the public interest depending on the nature and scope of the evidence presented by Applicant.

6. Protestant hereby requests that the application be set for oral hearing. If an oral hearing is held, protestant represents that it will appear and present evidence pertinent to the application.

7. Pursuant to Section 333(c) of the Public Utility Code (66 Pa. C.S.A. Sec. 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, and complaints, if any, or other evidence pertaining to the service of the protestant.

8. If a restrictive amendment will satisfy the interest of protestant, a proposed amendment is attached hereto as Appendix "C".

Respectfully submitted,



JOHN A. PILLAR
Attorney for
BYERS TAXI SERVICE, INC., Protestant

Due Date: June 13, 2016

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

APPENDIX "A"

Re: B & M Limousine Services, Inc.
Docket A-2016-2544790

Scope of Authority Sought

[To transport persons] in airport transfer service, from points in the Counties of Allegheny, Washington, Westmoreland and Somerset, to and from the Pittsburgh International Airport, the Allegheny County Airport and the Arnold Palmer Regional Airport.

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APPENDIX "B"

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: B & M Limousine Services, Inc.
Docket A-2016-2544790

The foregoing protest to the above application is filed on behalf of the following:

BYERS TAXI SERVICE, INC.

214-1/2 Longfellow Street

P. O. Box 336

Vandergrift, PA 15690

Byers Taxi Service, Inc. holds authority from this Commission at Docket A-105054, which includes authority, at Folder 3, to transport persons, in airport transfer service, as follows:

To transport persons, in airport transfer service, from points in Armstrong County on and south of U.S. Highway 422 and east of State Route 28, and from the Boroughs of Kittanning and West Kittanning, Armstrong County, and the cities of New Kensington, Arnold and Lower Burrell, the townships of Allegheny, Bell, Washington and Upper Burrell, and the boroughs of Vandergrift, East Vandergrift, Oklahoma, Avonmore, Hyde Park and West Leechburg, Westmoreland County, to the Pittsburgh International Airport located in the Township of Findlay, Allegheny County, and the Arnold Palmer Airport located in Unity Township, Westmoreland County.

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APPENDIX "C"

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: B & M Limousine Services, Inc.
Docket A-2016-2544790

Protestant, Byers Taxi Service, Inc., would consider withdrawing its opposition to the within application if the territory served by Protestant in Westmoreland County is removed from the scope of the application as an origin area.

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of June, 2016, I have served a true and correct copy of the foregoing Protest on the Applicant's representative, by certified mail, return receipt requested, as follows:

Deborah L. Roscioli, Esq.
700 East Garden Gate Drive, Suite 101
Mount Laurel, NJ 08054

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SECRETARY'S BUREAU



JOHN A. PILLAR
Attorney for
BYERS TAXI SERVICE, INC., Protestant



JOHN A. PILLAR

Attorney-at-Law

150 Green Commons Drive
Pittsburgh, Pennsylvania 15243



USA

NON-MACHINEABLE SURCHARGE

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
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