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October 10, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Application of Leon L. and Linda J. Fuller;
PUC Docket No. A-2016-2563259

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Protest and Request for Oral Hearing of the Protestant, Berwick Area Ambulance Association, Inc. regarding the above-referenced Application. As evidenced by the attached Certificate of Service, this filing has been served on the Applicant pursuant to the Commission's rules and within the required time frame. Please let us know if you have any questions regarding this matter.

Very truly yours,



Christina M. Mellott
for PAGE, WOLFBERG & WIRTH, LLC

CMM:ms
Enclosures

cc: Leon L. and Linda J. Fuller (*via first class mail*)
Berwick Area Ambulance Association, Inc. (*via email*)

in paratransit service, between points in the counties of Montour, Columbia and Luzerne, and from points in said counties, to points in Pennsylvania, and vice versa, Subject to the following condition: Provided that the authority granted herein shall be limited to the transportation of non-ambulatory patients requiring medical assistance of state-certified medical personnel, in vehicles specifically equipped for the transportation of passengers confined to wheelchairs or litters. A true and correct copy of the Certificate of Public Convenience, evidencing this authority held by Protestant, Berwick Area Ambulance Association, Inc. is attached hereto as Appendix B.

5. Approval of this Application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since: (a) the Protestant presently holds authority to provide service in the area affected by the Application prior to any resolution of the Application; (b) the 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 the 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 the 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.

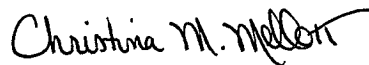
6. Protestant requests that the Application be set for oral hearing and that the Applicant be required to prove by competent evidence the elements of proof required by statute and regulation. If an oral hearing is held, the Protestant will appear and present evidence of the Protestant's own operations and particular interests unless this Application is amended so as to eliminate those interests as set forth in this Protest.

7. Pursuant to Section 333(c) of the Public Utility Code (66 Pa. C.S.A. § 333(c)), Protestant hereby requests a list of witnesses expected to testify in the above-titled proceeding, together with the subject matter of their anticipated testimony, and, in particular, any complaints or any evidence pertaining to the service of the Protestant.

8. The Protestant knows of no amendments that would satisfy its interests in this proceeding short of eliminating its interests as set forth herein by eliminating points of origin in Montour County.

WHEREFORE, Protestant, Berwick Area Ambulance Association, Inc., requests that the granting of the Application be withheld; the proceeding be assigned for oral hearing with leave to the Protestant to participate fully therein; and that the 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,



Christina M. Mellott, Esquire
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Counsel for Protestant,
Berwick Area Ambulance Association, Inc.

Dated: October 10, 2016

Appendix A

A-2016-2563259. Leon L. and Linda J. Fuller (905
Miller Road, Muncy, Northumberland County, PA 17756)
– for the right to transport as a common carrier, by motor
vehicle, persons in paratransit service, from points in the
Counties of Montour and Northumberland, to points in
Pennsylvania, and return.

**PENNSYLVANIA BULLETIN
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APPENDIX A

Appendix B

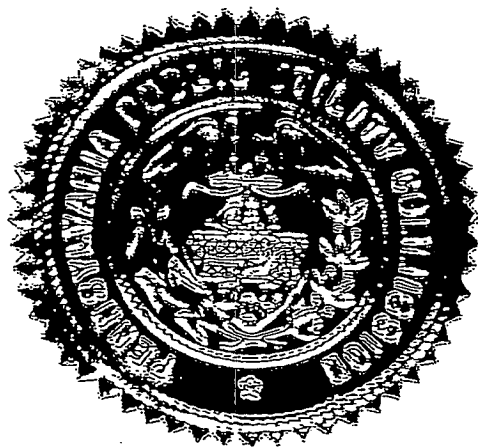
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN THE MATTER OF THE APPLICATION OF: A-00116333

Berwick Area Ambulance Association, Inc.,
a corporation of the Commonwealth of Pennsylvania

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 13th day of December, 2000.



James J. McNulty

Secretary

APPENDIX B

Certificate of Service

