



November 7, 2016

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

Re: Answer to Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement (PUC) v. PODS Enterprises, LLC; Docket No. C-2016-2571151

Dear Secretary Chiavetta,

The PUC filed a complaint against PODS Enterprises, LLC (PODS) on the basis that PODS failed to maintain evidence of cargo insurance on file with the PUC as required by Pennsylvania code. The complaint requires PODS to pay a penalty of \$500 for said alleged failure.

PODS has never had its cargo insurance coverage lapse at any point in time. Also, PODS has always had Form H on file with the commission as evidence of PODS's insurance coverage. However, PODS recently learned that Form H filed with the commission was filed by PODS's insurance carrier with an incorrect address. PODS immediately took action to remedy the situation upon discovery of the defect with the form filed. PODS caused its insurance carrier to promptly file with the commission a corrected Form H with the appropriate address. The commission should be in receipt of said form at this time. Attached is a copy of the corrected Form H filed with the Pennsylvania PUC reflecting the corrected address for your reference.

At PODS, we took this matter very seriously and immediately took the appropriate steps necessary to correct the situation when notified by the PUC. We hereby respectfully request that the \$500 fine be waived in this instance. At your convenience, please let me if the commission will be agree to waive the fine.

If you would like to discuss this matter further, please do not hesitate to contact me at (727) 538-6461.

Sincerely,
PODS Enterprises, LLC



Joe A. Guerrini
Corporate Counsel
jguerrini@pods.com

Encls.

