



**McNees**  
Wallace & Nurick LLC

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June 28, 2017

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA HAND DELIVERY**

**RE: Application of Mountain Movers, LLC.; Docket No. A-2017-2597578**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") is the Verified Statement of Montgomery Carlin on behalf of Mountain Movers, LLC in the above-referenced proceeding.

Sincerely,

McNEES WALLACE & NURICK LLC

By

Kenneth R. Stark  
Counsel to Mountain Movers, LLC

Enclosure

cc: Rodney Bender and Robert Bingaman, Technical Utility Services, PUC (via email)  
Barbara A. Darkes, McNees Wallace & Nurick LLC (via email)  
Montgomery Carlin, Mountain Movers, LLC (via email)

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**VERIFIED STATEMENT OF APPLICANT**

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THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THE APPLICANT'S FITNESS TO OPERATE. STATEMENTS SHOULD BE TYPED OR PRINTED. ILLEGIBLE STATEMENTS WILL DELAY YOUR APPLICATION.

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**A-2017-2597578**

PUC Application Docket No.

**Mountain Movers, LLC**

Legal Name of Applicant

N/A

Trade Name, if any

1141A Rear Upper Penn Avenue

Wyomissing

PA

19610

Street Address (principal place of business)

City or Municipality

State

Zip Code

The Verified Statement of the Applicant is more or less a business plan or your proposal for providing the transportation service for which you are making application. Prior to deciding to make application for operating authority from the Public Utility Commission, you likely gave much consideration to the manner in which you would operate the business in order that you could provide satisfactory service to your customers and so that you could make a reasonable profit. As part of the application process, you must provide the Commission with your proposal to provide the transportation service.

At minimum, the Verified Statement of the Applicant should include a discussion of the numbered items listed below and on the following pages. You are encouraged to provide as much information as possible about the particular subject as is necessary to fully explain your plan. If you fail to provide sufficient information about the subjects listed below, it may cause the review of your application to be delayed until you provide the necessary information. If you need more space to provide your explanation, please attach additional pages that list the appropriate item by number.

- 1. Identify the person making the Verified Statement on behalf of the applicant. If the applicant is a sole proprietor making the statement, this will be the same information as provided above. If an employee/officer of applicant is making the statement, give name, title, business address and telephone number, and indicate that the applicant's directors/owners/partners/etc. have authorized the witness to speak for the business.

**Montgomery Carlin, President of Mountain Movers, LLC ("Mountain Movers"), will make the Verified Statement on behalf of Mountain Movers, a two member LLC. Mr. Carlin has been authorized by his fellow member to speak on behalf of the business. Please note that Mountain Movers recently moved its office to 1141A Rear Upper Penn Avenue, Wyomissing, PA, 19610.**

**Mr. Carlin is and will be deeply familiar with the ongoing operations of Mountain Movers.**

2. List the applicant's affiliation (owner, manager, controls) with any other carrier, with the description of affiliation.

**None.**

3. Describe your business experience, particularly any experience relating to the operation of a transportation service. You may also include an explanation of education or training that you believe may be relevant.

**Mr. Carlin has been a business owner since 1988. At that time, he had graduated from Brooklyn Law School and opened a law practice specializing in Immigration law. Mr. Carlin has firsthand knowledge of the qualifications and skills necessary to running a business. In approximately 2006, Mr. Carlin entered the antique business where he has gained extensive knowledge into the moving business, including the legalities and procedures. Mr. Carlin is familiar with the types of individuals and personnel who work in the moving business. Mr. Carlin feels that he is an effective communicator and will be a good supervisor. Mr. Carlin has experience packing trucks and supervising workers in safely packing and securing items.**

4. Describe your facilities, record maintenance plan and your communication network. Please include a description of your physical location, to include the office area, office machines that will be utilized, and the facility to house vehicles. Household goods in use carriers should include a description of their storage facilities, if applicable. Please include an explanation of your plan to maintain records required by the PUC, as well as normal business records. In regard to your communication network, please explain how you will receive customer requests for transportation, how you will dispatch the vehicles to fulfill the request, and how you will maintain continuous communication with your drivers. Finally, please state your intended business hours.

**The current facility is a private warehouse space of approximately 2000 square feet. An oversized garage door leads into a secure warehouse area. The space has two offices that will house the management team. The facility will house a packing van when it is purchased. The space will be used to house supplies of blankets, boxes, wrapping paper, four wheelers, and other necessary items. The space is clean and secure. Mountain Movers will ensure that sufficient resources are used to maintain and improve the building, grounds, and office areas to ensure a safe and secure environment for all employees and drivers.**

**The communication network to receive requests for business will initially be handled by Mr. Carlin and his partner. Mountain Movers will have an internet site and will also apply to receive leads through third parties like PUC-licensed brokers. Mr. Carlin will maintain continuous communications with Mountain Movers' drivers. As the business grows, Mountain Movers will invest more in communication technologies to ensure it is effectively serving its customers.**

**Mr. Carlin will be responsible for maintaining company records in accordance with PUC regulations. Records will be indexed, filed, and organized in a systematic manner to ensure proper security and access to company records.**

**The intended business hours for the company will be 8 a.m. to 6 p.m. from Monday to Saturday. Access to the online web site should be available 24/7.**

5. Please state the number of employees you intend to use, along with a description of their duties. Please explain why that number of employees is appropriate to provide reasonable and efficient service to the geographical territory you will be serving. (Do not address drivers in your explanation about this item; drivers are addressed separately in item # 6).

**Initially, the two members of the LLC will be the only workers/employees. Additional moving help will be on a per diem basis. The company's intent is to hire two full-time employees when necessary. The volume of undertaken and expected moves will drive the need to expand the business. The need to expand the business is driven by the amount of moves undertaken and expected. Mountain Movers aims to grow and progress to a larger company in time. The number of employees will then depend on the amount of available work.**

6. Please state the number of drivers you intend to use or hire in your business and explain why that number of drivers is appropriate for the size of the geographical territory you will be serving. In addition, please explain:

**Mr. Carlin and his partner are both qualified drivers who possess the necessary licenses to drive the vehicles. The type of truck that Mountain Movers will be using does not require a commercial driver's license. As the company grows, Mountain Movers will look for additional drivers who are able to pass criminal background checks and who possess the necessary driver's licenses.**

- a. Your hiring standards for drivers;

**All drivers will be subject to a criminal background check and driving record check.**

- b. Your system to ensure prospective drivers will be subject to a criminal background check;

**Criminal background checks will be required.**

- c. Your driver training program;

**Mountain Movers will only hire experienced drivers that require minimal additional training. Additional training may be available upon request.**

- d. Your system for ensuring that your drivers are properly licensed at all times;

**Valid driver's licenses must be produced upon hire and any changes to the driver's status must be reported immediately to Mountain Movers' management.**

- e. Your system to ensure that all drivers will be subject to a criminal background check every two years;

**Mr. Carlin will maintain records and have the company's Human Resources department maintain dates of employment so that Mountain Movers may verify any changes in driver license status.**

- f. Your policies regarding alcohol and drug use by your drivers.

**Drug and alcohol use on the job will not be tolerated by Mountain Movers.**

- 7. Please state the number of vehicles you plan to use in your business and why that number is appropriate to provide reasonable and efficient service to the geographical territory you will be serving. If you have already obtained vehicles for your business, please list them in the chart below. Taxicabs and limousines may not be used if the vehicle's age is greater than eight model years.

**Mountain Movers has not obtained any vehicles as of this date. Mountain Movers is waiting for the PUC license before purchasing any vehicles. The company plans to use two permanent company owned vehicles: a 20-foot moving truck and a utility van to transport supplies to the job sites.**

<u>YEAR</u>	<u>MAKE</u>	<u>MODEL</u>	<u>SEATING CAPACITY</u>	<u>VEHICLE ID #</u>

- 8. Describe your vehicle safety program. Please include the following in your explanation:

- a. Your periodic vehicle maintenance plan;

**Our vehicles will be subject to routine maintenance checks. Mountain Movers will make sure that its routine maintenance checks are aligned with PUC regulatory requirements and industry standards. Mountain Movers will make sure the required vehicle safety inspections are up-to-date.**

- b. Your system for ensuring your vehicles will continuously comply with Pennsylvania's equipment standards (67 Pa. Code, Chapter 175) that are applicable to the type of vehicles used in your business;

**Mountain Movers will comply with Pennsylvania equipment standards. Initially, the company may lease vehicles from third parties like Penske or**

**U-Haul, but Mountain Movers will verify that their vehicles are compliant with PUC regulatory standards. Soon after receiving its PUC license, Mountain Movers plans to purchase its own vehicles.**

- c. Your system for ensuring your vehicles will maintain compliance with the PUC's requirements for passenger service at 52 Pa. Code, Section 29.403 (applicable to passenger applicants only);

**Not Applicable**

- d. Your system for replacing vehicles once they are greater than eight model years in age in compliance with 52 Pa. Code, Section 29.314(d) (applicable to taxicabs) or 52 Pa. Code, Section 29.333(e) (applicable to limousines);

**Not Applicable**

- e. Your system for ensuring the filing of an annual vehicle list (taxicabs and limousines);

**Not Applicable**

- f. Your system for ensuring your vehicles will comply with the requirements of 49 CFR Parts 393 and 396, as adopted by the PUC at 52 Pa. Code, Chapter 37 (applicable to HHG applicants).

**Mr. Carlin will maintain a system to ensure compliance with the federal and PUC regulations. Mr. Carlin will keep printed versions of the requirements of 49 CFR Parts 393 and 396, as adopted by the PUC at 52 Pa. Code, Chapter 37, available to ensure his constant familiarity with those requirements. Mr. Carlin will share his knowledge and understanding of these requirements with his colleague/partner. Mountain Movers will instruct any of its drivers and future employees about these requirements.**

- 9. Please explain what steps you have taken to determine if you can obtain and pay the premiums to maintain insurance coverage for the proposed number of vehicles for your business.

**Mountain Movers has obtained insurance with coverage levels exceeding the state minimum requirements for two vehicles. This policy will be paid in advance to ensure compliance.**

- 10. Please describe your customer service standards. Within your description, please explain:

- a. Your plan to inform customers of the procedures for filing complaints with the PUC;

**In regard to customer service standards, Mr. Carlin will be in charge of notifying prospective clients of their rights to file a formal or informal**

**complaint with the PUC. Mountain Movers is a very conservative operation that will dedicate its resources to ensure customer satisfaction.**

- b. Your intended customer complaint resolution procedure.

**The company's plan is to first resolve any disputes informally and internally to avoid the need for PUC action. Because Mountain Movers is a small company, Mr. Carlin will personally handle and address any complaints.**

**If an informal resolution is not achievable, Mountain Movers would refer the customer to the PUC's web site, which provides informative details on the formal and informal complaint processes at the Commission. Mountain Movers will also provide the customer with the PUC's hotline phone number at 1-800-692-7380.**

11. Criminal Record. Have you been convicted of a misdemeanor or felony for which you remain subject to supervision by a court or correctional institution?

**No.**

12. Financial Data. In addition to demonstrating your technical fitness, you must also demonstrate that you possess the financial fitness to provide the proposed transportation service. Therefore, you must complete both parts of the "Statement of Financial Position", which follows this page. The first part is the Balance Sheet. You need only provide the applicable information. The second part of the Statement of Financial Position is the Projected Income Statement. The projection is your estimation of expected revenues and specific expenses for one year. You should use the projected information, along with the financial data reported on your balance sheet to help you determine if proposed business can be feasible. Please feel free to also provide clarification information with your "Statement of Financial Position", which explains why you believe you have sufficient funds to ensure your transportation business can provide reliable service to the public in a safe manner.

**Please see attached statements. Mountain Movers is a new business; therefore, only some information is available and applicable for Statement of Financial Position (the Balance Sheet and the One Year Projected Income Statement).**

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### Verification of Statement

The undersigned deposes and says that he/she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his/her knowledge, information, and belief. The undersigned understands that false statements herein are made subject to penalties of 18 Pa. C. S. Section 4904 relating to unsworn falsification to authorities.



\_\_\_\_\_  
(Signature)

6/27/2017

\_\_\_\_\_  
(Date)

MONTGOMERY CARLIN; PRESIDENT

(Name and Title, printed or typed)



**Statement of Financial Position (Balance Sheet)**

As of (date) 6/27/2017

ASSETS

Current Assets			
Cash		30,000	
Accounts Receivable		0	
Notes Receivable		0	
Other Current Assets (specify)		0	
	Total Current Assets		<u>30,000</u>
Tangible Assets			
Motor Vehicle Equipment		0	
Less: Accumulated Depreciation		0	0
-			=
Building and Structures		0	
Less: Accumulated Depreciation	-	0	0
			=
Office Equipment		10,000	
Less: Accumulated Depreciation	-	0	10,000
			=
Land			0
Investments and Funds (specify)			0
Intangible Assets			0
Other Assets (advances and idle equipment – specify)			0
	<b>TOTAL ASSETS</b>		<u><b>40,000</b></u>

LIABILITIES

Current Liabilities (Due within one year of date)			
Accounts Payable		0	
Notes Payable Affiliate		0	
Equipment Obligations		0	
Other Liabilities (Attach schedule)		0	
	Total Current Liabilities		<u>0</u>
Long Term Liabilities (Due after one year of date)			
Accounts Payable		0	
Notes Payable		0	
Equipment Obligations		0	
Other Liabilities (Attach Schedule)		0	
	Total Long Term Liabilities		<u>0</u>
	<b>TOTAL LIABILITIES<sup>1</sup></b>		<u><b>0</b></u>

NET WORTH (Partnerships and individuals, only)

N/A

OWNER'S EQUITY (Corporations only)

Capital Stock			
Additional Paid-in Capital			
Retained Earnings			
Less: Treasury Stock	-		=
	Total Owner's Equity		

**TOTAL LIABILITIES & OWNER'S EQUITY** N/A

<sup>1</sup> There are no liabilities yet because Mountain Movers will not commence operations until it receives its PUC license. Upon receipt of its PUC license, Mountain Movers will begin making more operational investments and will incur liabilities. Expenses for Year 1 are reflected in the One Year Projected Income Statement.

**STATEMENT OF FINANCIAL POSITION**  
**One Year Projected Income Statement (starting in or around July 15, 2017)<sup>2</sup>**

**REVENUE and GAINS**

Operating Revenue	<b><u>149,760</u></b>
Net Revenue from non-carrier operations	<u>0</u>
Dividend and interest revenues	<u>0</u>
Other non-operating revenue	<u>0</u>
Gains	<u>0</u>
Total Revenue and Gains	<b><u>149,760</u></b>

**EXPENSES**

Equipment Maintenance and Garage Expense	<b><u>8,000</u></b>
Insurance Expense	<b><u>6,500</u></b>
Employee Salaries	<b><u>49,900</u></b>
Supervisory Salaries	-
Officer Salaries	<b><u>24,000</u></b>
Fuel Expense	<b><u>4,000</u></b>
Purchased Transportation (Lease Expense)	<b><u>20,000</u></b>
Materials and Supplies Expense ( <b>Direct</b> )	<b><u>200</u></b>
General Office Expense	<b><u>2,000</u></b>
Advertising Expense	<b><u>2,500</u></b>
Telephone Expense	<b><u>600</u></b>
Accounting Expense	<b><u>800</u></b>
Legal Expense	<b><u>1,000</u></b>
Uncollectible Revenue	<u>0</u>
Depreciation Expense	<u>0</u>
Amortization	<u>0</u>
Operating Taxes and Licenses	<b><u>N/A</u></b>
Rent Expense ( <b>interest</b> )	<b><u>0</u></b>
Loss	
Total Operating Expenses and Losses	<b><u>119,500</u></b>

**Net Income Before Taxes**

Provision for Income Taxes	<b><u>3,000</u></b>
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**Net Income (Loss)**

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<sup>2</sup> Mountain Movers notes that projected income for its initial year of operations is less than projected income for subsequent years. As a new business, there are certain start-up costs that will not necessarily be incurred in future years.