

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of	:	Commission Docket No.
Eagle Ride Taxi Cab Limited	:	A-2017-2621976
Liability Company	:	

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, come Joint Protestants, EZ Taxi LLC, Express Taxi LLC, Reading City Cab, LLC, and Amigo Cab, LLC (“Joint Protestants” or “Protestants”), pursuant to 52 Pa. Code § 3.381, file this Joint Protest of the Eagle Ride Taxi Cab Limited Liability Company (“Applicant”) for authority to provide common carrier transportation service.

In support thereof, Protestants submit the following:

1. The name and address of Protestants are:

EZ Taxi LLC,
2304 Walnut Street
Harrisburg, PA 17103

Express Taxi, LLC
2304 Walnut Street
Harrisburg, PA 17103

Reading City Cab, LLC
2304 Walnut Street
Harrisburg, PA 17103

Amigo Cab, LLC
2304 Walnut Street
Harrisburg, PA 17103

2. The name and address of Protestants’ attorney is:

Anthony J. DelGrosso, Esq.
Law Office of Anthony J. DelGrosso
PO Box 62405
Harrisburg, PA 17106-2405
P: 717.836.0055 | F: 717.833.0755

3. Applicant has filed an Application with the Public Utility Commission (the "Commission") for the right to begin to transport, as a common carrier, by motor vehicle, persons in call or demand service in the City of Lancaster, and within as airline distance of 15 miles of the limits of said city.
4. Protestant EZ Taxi, LLC, holds authority of the Commission in conflict with the authority sought by Applicant. Protestant's authority is at Docket No. A-00119741 F.2 Am-A.
5. Protestant Express Taxi, LLC, holds authority of the Commission in conflict with the authority sought by Applicant. Protestant's authority is at Docket No. A-2015-2475967.
6. Protestant Reading City Cab, LLC, holds authority of the Commission in conflict with the authority sought by Applicant. Protestant's authority is at Docket No. A-2016-2524649.
7. Protestant Amigo Cab, LLC, holds authority of the Commission in conflict with the authority sought by Applicant. Protestant's authority is at Docket No. A-2015-2475776.
8. Applicant failed to attach any financial information to its application that would indicate Applicant's financial fitness, thus Protestants believe and therefore aver that Applicant does not possess the requisite financial fitness to provide the proposed service.
9. Applicant failed to attach information to its application that would indicate how Applicant intends to operate, thus Protestants believe and therefore aver that Applicant does not possess the requisite technical fitness to provide the proposed service.

10. Applicant has submitted no evidence indicating that Applicant can meet the criteria in 52 Pa. Code § 41.14, thus approval of the Application is not necessary or proper for the service, accommodation, convenience, or safety of the public and would be contrary to public interest.

11. Protestants submit that entry of a new carrier would endanger or impair the operations of existing carriers, including those of Joint Protestants, to an extent that, on balance, the granting of authority would be contrary to public interest.

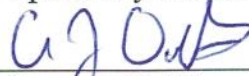
12. Protestants are unaware of any restrictive amendment that would adequately protect Protestants' interests to the point where they will withdraw their Protests. However, Protestants are open and willing to negotiate such an agreement.

13. Regarding any hearing on this matter, pursuant to Pennsylvania Public Utility Code 66 Pa. C.S. § 333(c), demand is made upon Applicant to furnish to Protestants' counsel a list of the names and addresses of any witnesses, along with names and addresses of any entity that the witnesses may represent and the subject matter of the witness's testimony. This is a continuing request and is applicable to all witnesses to be called.

WHEREFORE, Joint Protestants, EZ Taxi LLC, Express Taxi LLC, Reading City Cab, LLC, and Amigo Cab, LLC, respectfully request that this honorable Commission deny the Application of Eagle Ride Taxi Cab Limited Liability Company.

Date: October 12, 2017.

Respectfully submitted,



Anthony J. DelGrosso, Esq.
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VERIFICATION

I, Maher S. Ahmed, General Manager for Joint Protestants, hereby verify that the statements made in the foregoing Joint Protest are true and correct to the best of my knowledge, information and belief. I understand that the statements in the foregoing document are made subject to the penalties of 18 Pa.C.S. §4909 relating to unsworn falsification to authorities.

Date 10/12/2017



Maher S. Ahmed
General Manager, Joint Protestants
EZ Taxi LLC, Express Taxi LLC,
Reading City Cab, LLC, and Amigo Cab,
LLC

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CERTIFICATE OF SERVICE

Pursuant to the Commission's Rules of Procedure, I hereby certify that on this 12th day of October, 2017 I served the following parties with the foregoing *Joint Protest* via the means listed below:

Via First Class Mail:

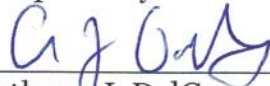
Eagle Ride taxi Cab Limited, Limited Liability Company
1260 Union St.
Lancaster, PA 17603

VIA First Class Mail and Email:

Autocab, Inc.
c/o: Thomas T. Niesen, Esq.
Thomas, Niesen & Thomas, LLC
212 Locust St., Suite 600
Harrisburg, PA 17101
Attorney for Protestant, Autocab, Inc.

Date: October 12, 2017

Respectfully submitted,



Anthony J. DelGrosso, Esq.
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