

S&P NETWORK, LLC
3596 N 4th Street
Harrisburg, PA 17110
717-991-8812

"Prioritizing Safety, Efficiency & Communication"

May 6th, 2018

VIA EFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17102

RE: Application of S&P Network, LLC to operate as a Common Carrier of Household Goods in Use

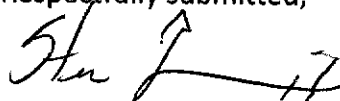
Between points within the Commonwealth of Pennsylvania; Docket No. A-2018-3000445

Dear Secretary Chiavetta:


On February 13th 2018 we filed the above referenced application with the Pennsylvania Public Utility Commission. Enclosed for electronic filing today is an addendum to include the display of our successfully completed USDOT new entrant safety audit that was conducted on May 1st 2018.

Please contact me if you have any questions regarding this filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steve Paparounis", with a stylized flourish at the end.

Steve Paparounis

	USDOT#	Legal: S&P NETWORK LLC	Review Date:
	3083604	Operating (DBA):	5/1/2018

Part A - General Information

MC/MX #: 68080 State #: Federal Tax ID:
 Review Type: Safety Audit – New Entrant Location of Review/Audit: Company Facility in the U. S.
 Scope: Entire Operation Territory:

Operation Types Interstate Intrastate

Carrier: Non-HM N/A
 Shipper: N/A N/A
 Cargo Tank: N/A

Business: Corporation
 Gross Revenue: \$117,649.00
 for year ending: 12/31/2017

Company Physical Address:

3596 N 4TH ST
 HARRISBURG, PA 17110, US

Contact Name: Steve Paparounis - Managing Member (Officer)
 Phone numbers: (1) 717-775-4937 (2) Fax
 E-Mail Address:

Company Mailing Address:

3596 N 4TH ST
 HARRISBURG, PA 17110, US

Carrier Classification

Authorized For Hire; Private Property

Cargo Classification

Building Materials; General Freight; Household Goods

Driver Information

	Interstate	Intrastate	Average trip leased drivers/month:
< 100 Miles:	0	0	0
>= 100 Miles:	1	0	0
			Total Drivers: 1
			CDL Drivers: 0

Equipment

	Owned	Term Leased	Trip Leased	Owned	Term Leased	Trip Leased
Truck	1	0	1			

Power units used in the U.S.: 2
 Percentage of time used in the U.S.: 100





S&P NETWORK LLC
USDOT#: 3083604

Review Date:
5/1/2018

Part A

Questions regarding this Safety Audit may be directed to

New Entrant Coordinator at the address below

Pa. Public Utility Commission Investigation and Enforcement Attn: New Entrant Coordinator
100 Lackawanna Ave., Room 320
Scranton, PA 18503 (570) 963-4552

This SAFETY AUDIT will be used to assess your safety compliance.

Person(s) Interviewed:

Name: Steve Paparounis

Title: Managing Member

Safety Investigator Name: Snyder

Code: PA6122



Part B - Questions and Answers

An asterisk (*) beside an answer indicates an area of non-compliance by the motor carrier, and negatively affects the results of the audit.

Question Factor 1. General Question #1 Section #387.7(a) Acute Does the carrier have the required minimum level of financial responsibility in effect (property carrier)?	Answer Yes
Question Factor 1. General Question #2 Section #387.7(d) Critical Does the carrier have required proof of financial responsibility (property carrier)?	Answer Yes
Question Factor 1. General Question #3 Section #387.31(a) Acute Does the carrier have the required minimum level of financial responsibility in effect (passenger carrier)?	Answer N/A
Question Factor 1. General Question #4 Section #387.31(d) Critical Does the carrier have required proof of financial responsibility (passenger carrier)?	Answer N/A
Question Factor 1. General Question #5 Section #13901 392.9a(a) Is the motor carrier authorized to conduct interstate operations in the United States?	Answer Yes
Question Factor 1. General Question #6 Section #390.15(b)(1) Can the carrier provide a complete accident register of recordable accidents for up to 3 years after each accident?	Answer N/A
Question Factor 1. General Question #7 Section #390.21 Does the carrier know the commercial motor vehicles marking requirements?	Answer Yes
Question Factor 2. Driver Question #1 Section #391.51(b)(1) Does the carrier maintain driver's application in accordance with 391.21?	Answer Yes
Question Factor 2. Driver Question #2 Section #391.51(b)(2) Critical Does the carrier maintain a copy of the motor vehicle record received from each State pursuant to 391.23(a)(1)?	Answer Yes
Question Factor 2. Driver Question #3 Section #391.51(b)(3) Does the carrier maintain the certificate of driver's road test pursuant to 391.31(e) or copy of the license accepted as equivalent to the driver's road test pursuant to 391.33?	Answer No *
Additional Documents Required None	
Comments Steve Paprounis, 4/24/18	
Question Factor 2. Driver Question #4 Section #391.51(b)(4) Does the carrier maintain the motor vehicle record from each state driver licensing agency to the annual driver record inquiry required by 391.25(a)?	Answer N/A
Question Factor 2. Driver Question #5 Section #391.51(b)(5) Does the carrier maintain the annual review of the driver's driving record as required by 391.25(c)(2) ?	Answer N/A



Question Factor 2. Driver Question #6 Section #391.51(b)(6) Does the carrier maintain a list or certificate relating to violations of motor vehicle laws required by 391.27?	Answer N/A
Question Factor 2. Driver Question #7 Section #391.51(b)(7) Critical Does the carrier maintain the medical examiner's certificate as required by 391.43(g)?	Answer Yes
Question Factor 2. Driver Question #8 Section #391.51(b)(8) Does the carrier maintain a Skill Performance Evaluation Certificate (SPEC)?	Answer N/A
Question Factor 2. Driver Question #9 Section #391.53(a) Does the carrier maintain investigations into the driver safety performance history?	Answer Yes
Question Factor 2. Driver Question #10 Section #391.11(b)(4) Acute Is the carrier using physically qualified drivers?	Answer Yes
Question Factor 2. Driver Question #11 Section #391.15(a) Acute Is the carrier using any disqualified drivers?	Answer No
Question Factor 2. Driver Question #12 Section #382.115(a), 382.115(b) Acute Has the carrier implemented an alcohol and/or controlled substances testing program?	Answer N/A
Question Factor 2. Driver Question #13 Section #382.213(b) Acute Has the carrier used drivers who have used controlled substances?	Answer N/A
Question Factor 2. Driver Question #14 Section #382.215 Acute Has the carrier used a driver who has tested positive or has adulterated or substituted a test specimen for a controlled substance?	Answer N/A
Question Factor 2. Driver Question #15 Section #382.201 Acute Has the carrier used a driver known to have an alcohol concentration of 0.04 or greater?	Answer N/A
Question Factor 2. Driver Question #16 Section #382.505(a) Acute Has the carrier used a driver found to have an alcohol concentration of .02 or greater but less than .04 within 24 hours of being tested?	Answer N/A
Question Factor 2. Driver Question #17 Section #382.301(a) Critical Has the carrier ensured that drivers have undergone testing for controlled substances prior to performing a safety sensitive function?	Answer N/A
Question Factor 2. Driver Question #18 Section #382.303(a) Critical Has the carrier conducted post accident testing on drivers for alcohol?	Answer N/A
Question Factor 2. Driver Question #19 Section #382.303(b) Critical Has the carrier conducted post accident testing on drivers for controlled substances?	Answer N/A
Question Factor 2. Driver Question #20 Section #382.305 Acute Has the carrier implemented random testing program?	Answer N/A
Question Factor 2. Driver Question #21 Section #382.305(b)(1) Critical Has the carrier conducted random alcohol testing at an annual rate of not less than the applicable annual rate or prorated rate of the average number of driver positions?	Answer N/A



Question Factor 2. Driver Question #22 Section #382.305(b)(2) Critical	Answer
Has the carrier conducted controlled substance testing at the applicable prorated rate of not less than the applicable annual rate of the average number of driver positions?	N/A
Question Factor 2. Driver Question #23 Section #40.305(a)	Answer
Has the carrier conducted the required return-to-duty tests on employees returning to safety-sensitive functions?	N/A
Question Factor 2. Driver Question #24 Section #40.309(a)	Answer
Is the carrier conducting follow-up testing as directed by the Substance Abuse Professional?	N/A
Question Factor 2. Driver Question #25 Section #382.211 Acute	Answer
Has the carrier used a driver who has refused to submit to an alcohol or controlled substances test required under Part 382?	N/A
Question Factor 2. Driver Question #26 Section #382.503 Critical	Answer
Has the carrier used a Substance Abuse Professional as required by 49 CFR Part 40 Subpart O?	N/A
Question Factor 2. Driver Question #27 Section #382.601	Answer
Does the carrier have a copy of a complete alcohol and drug testing policy?	N/A
Question Factor 2. Driver Question #28 Section #382.603	Answer
Does the carrier have evidence that all designated supervisors have received the required Reasonable Suspicion Supervisor Training?	N/A
Question Factor 2. Driver Question #29 Section #383.23(a) Critical	Answer
Has a driver operated a commercial motor vehicle without a current operating license, or a license, which hasn't been properly classed and endorsed?	N/A
Question Factor 2. Driver Question #30 Section #383.37(b) Acute	Answer
Has the motor carrier knowingly allowed it's drivers who's CDLs have been suspended, revoked or canceled by a state, have lost the right to operate a CMV in a State, or have been disqualified from operating a CMV to operate a commercial motor vehicle?	N/A
Question Factor 2. Driver Question #31 Section #383.51(a) Acute	Answer
Has the motor carrier knowingly allowed, required, permitted, or authorized a driver to drive who is disqualified to drive a commercial motor vehicle?	N/A
Question Factor 3. Operation Question #1 Section #395.1(e)(1), 395.1(e)(2)	Answer
Does the carrier have a system for recording hours of duty status on 100/150- mile radius drivers, and are they properly utilizing the 100/150 air-mile radius exemption?	N/A
Question Factor 3. Operation Question #2 Section #395.8(a) Critical	Answer
Does the carrier require drivers to make a record of duty status using the required method?	Yes
Question Factor 3. Operation Question #3 Section #395.8(i) Critical	Answer
Does the carrier require drivers to submit records of duty status within 13 days?	Yes
Question Factor 3. Operation Question #4 Section #395.8(k)(1) Critical	Answer
Can the carrier produce records of duty status and supporting documents for selected drivers?	Yes
Question Factor 3. Operation Question #5 Section #395.3(a)(1) Critical	Answer
Has the carrier allowed driver(s) to exceed the 11-hour rule? (Property)	No



Question Factor 3. Operation Question #6 Section #395.3(a)(2) Critical Has the carrier allowed driver(s) to exceed the 14-hour rule? (Property)	Answer No
Question Factor 3. Operation Question #7 Section #395.3(b)(1) Critical Has the carrier allowed driver(s) to drive after having been on duty more than 60 hours in 7 consecutive days? (Property)	Answer No
Question Factor 3. Operation Question #8 Section #395.3(b)(2) Critical Has the carrier allowed driver(s) to drive after having been on duty more than 70 hours in 8 consecutive days? (Property)	Answer N/A
Question Factor 3. Operation Question #9 Section #395.5(a)(1) Critical Has the carrier allowed driver(s) to exceed the 10 hour rule? (Passenger)	Answer N/A
Question Factor 3. Operation Question #10 Section #395.5(a)(2) Critical Has the carrier allowed driver(s) to exceed the 15 hour rule? (Passenger)	Answer N/A
Question Factor 3. Operation Question #11 Section #395.5(b)(1) Critical Has the carrier allowed driver(s) to drive after having been on duty more than 60 hours in 7 consecutive days? (Passenger)	Answer N/A
Question Factor 3. Operation Question #12 Section #395.5(b)(2) Critical Has the carrier allowed driver(s) to drive after having been on duty more than 70 hours in 8 consecutive days? (Passenger)	Answer N/A
Question Factor 3. Operation Question #13 Section #395.8(e) Critical Does available evidence indicate a selected driver has prepared a false record of duty status?	Answer No
Question Factor 3. Operation Question #14 Section #392.2 Critical Does the motor carrier ensure that drivers operate commercial motor vehicles in accordance with the laws, ordinances, and regulations of the jurisdictions in which they are operating?	Answer Yes
Question Factor 3. Operation Question #15 Section #392.9(a)(1) Critical Does the carrier ensure that drivers are not permitted to drive a vehicle without the cargo properly distributed and adequately secured?	Answer Yes
Question Factor 3. Operation Question #16 Section #392.4(b) Acute Have any drivers operated a commercial motor vehicle while under the influence of, or in possession of, narcotic drugs, amphetamines, or any other substances capable of rendering the drivers incapable of safely operating motor vehicles?	Answer No
Question Factor 3. Operation Question #17 Section #392.5(b)(1) Acute Have any drivers operated a commercial motor vehicle while under the influence of, or in possession of, intoxicating beverages?	Answer No
Question Factor 3. Operation Question #18 Section #392.5(b)(2) Acute Have any drivers operated a commercial motor vehicle within 4 hours of having consumed intoxicating beverages?	Answer No
Question Factor 3. Operation Question #19 Section #392.80(b)/ 392.82 Have any drivers operated a commercial motor vehicle while engaged in texting or using a handheld mobile device?	Answer No
Question Factor 4. Maintenance Question #1 Section #396.3(b) Critical Can the carrier produce complete maintenance files for requested vehicle(s)?	Answer Yes



Question Factor 4. Maintenance Question #2 Section #396.17(a) Critical Does the motor carrier conduct periodic (annual) inspections for selected vehicles?	Answer Yes
Question Factor 4. Maintenance Question #3 Section #396.19 Is the carrier using qualified inspectors (mechanic) and maintaining evidence of the inspector's qualifications?	Answer Yes
Question Factor 4. Maintenance Question #4 Section #396.21(b)(1) Can the motor carrier produce evidence of periodic (annual) inspections for selected vehicles?	Answer Yes
Question Factor 4. Maintenance Question #5 Section #396.11(a) Critical Does the motor carrier require drivers to complete vehicle inspection reports daily?	Answer Yes
Question Factor 4. Maintenance Question #6 Section #396.11(c) Acute Does the carrier ensure that out-of-service defects listed by the driver in the driver vehicle inspection reports are corrected before the vehicle is operated again?	Answer N/A
Question Factor 4. Maintenance Question #7 Section #396.9(c)(2) Acute Does the carrier ensure vehicles that have been declared "out-of-service" do not operate before repairs have been made?	Answer N/A
Question Factor 4. Maintenance Question #8 Section #396.3 Can the carrier explain its systematic, periodic maintenance program?	Answer Yes
Question Factor 7. Other Question #1 Section #375.211 Does the carrier participate in an Arbitration Program?	Answer Yes
Question Factor 7. Other Question #2 Section #13702 Does the carrier assess shipper freight charges based upon published tariffs?	Answer Yes
Question Factor 7. Other Question #3 Section #375.401(c) Does the carrier provide reasonably accurate estimates of moving charges?	Answer Yes
Question Factor 7. Other Question #4 Section #375.407(a), 375.703(b) Has the carrier avoided "hostage freight" or other predatory practices?	Answer Yes
Question Factor 7. Other Question #5 Section #387.301(a), 387.301(b) Does the HHG carrier have sufficient levels of public liability and cargo insurance?	Answer Yes
Question Factor 7. Other Question #6 Section #375.215 Does the carrier have a published tariff and is the motor carrier charging the applicable rate (375.215).	Answer Yes
Question Factor 7. Other Question #7 Section #375.213 Can the motor carrier identify the five documents required to be given to a prospective individual shipper prior to executing an order for service?	Answer Yes
Question Factor 7. Other Question #8 Section #49 CFR 37 subpart H Does the carrier have the means to provide accessible over-the-road bus (OTRB) service on a 48-hour advance notice basis by its owned or leased OTRBs?	Answer N/A
Question Factor 7. Other Question #9 Section #49 CFR 37 subpart H If the carrier does not have the means then does the carrier have an arrangement with another carrier that operates accessible OTRBs?	Answer N/A



Question Factor 7. Other Question #10 Section #Motorcoach Safety Action Plan	Answer
Does the over-the-road bus company own or lease a facility for inspection, repair, and maintenance of its vehicles?	N/A
Question Factor 7. Other Question #11 Section #Motorcoach Safety Action Plan	Answer
Does the over-the-road bus company have an arrangement or contract for systematic inspection, repair, and maintenance of its vehicles?	N/A

Note: No Hazardous Materials questions were asked because the carrier does not carry Hazardous Materials in Interstate Commerce.





Part B

Your Proposed Safety Audit Result is: **PASS**

Explanation of Scoring Methodology

Factor	Failed Questions		Performance Test Status	Total Points	Factor Status
	Critical	Acute			
1. General	0	0	—	0	PASS
2. Driver	0	0	—	0	PASS
3. Operations	0	0	—	0	PASS
4. Maintenance	0	0	PASS — 0.00 %	0	PASS
5. Hazardous Materials	—	—	—	—	—
6. Accidents	—	—	PASS — 0.00	—	PASS
SUM	0	0		0	PASS

Result: Carrier has adequate basic safety management controls in place.

NOTE: Carrier has the right to request a review of this determination if there are factual or procedural disputes.

HOW THE SA IS SCORED

FACTORS - The Federal Motor Carrier Safety and Federal Hazardous Material Regulations are categorized into six factors. Multiple questions address the various factors. The Part B Question & Answer Report lists the CFR section numbers related to each question.

CRITICAL/ACUTE - Questions are also defined as CRITICAL, ACUTE or neither depending on the significance of the underlying regulation. Questions are assigned a point value if they are incorrectly answered. Critical = 1 and Acute = 1.5. The point values are summed for each factor. Any factor with a point value of 3 or more is marked "FAILED".

OUT OF SERVICE (OOS) RATE - The Driver/Vehicle OOS rate is used in factor #4 as another question. If there have been at least three level 1, 2, or 5 North American Standard Inspections conducted over the past year, they will be summarized. If the summed OOS rate is 34% or above, one additional point is assigned to that factor.

CRASH FACTOR - Carriers are defined as urban or non-urban in order to compensate for the higher crash risk of urban operations. Urban carriers are defined as those that operate within a 100 air-mile radius. The crash rate for a carrier is calculated as accidents per million miles traveled. Factor #6 is "FAILED" if the urban carrier crash rate exceeds 1.7 or the non-urban carrier crash rate exceeds 1.5.

OVERALL STATUS DETERMINATION - Any carrier with 3 or more "FAILED" factors is deemed to have failed the Safety Audit by having inadequate safety management controls in place to operate in the U.S.

