

Karen O. Moury
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August 7, 2019

VIA EFILING

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17105-3265

Re: Pa. Public Utility Commission, Bureau of Investigation and Enforcement v. Erie
Transportation Services Inc. t/a Erie Yellow Cab, Docket No. C-2019-3011255

Dear Secretary Chiavetta:

On behalf of Erie Transportation Service, Inc. ("Erie Transportation"), please accept this letter in lieu of a formal answer to the Complaint served in the above-captioned matter on July 25, 2019. The Complaint contains a series of allegations concerning the payment of regulatory assessments for 2014 through 2018.

On June 27, 2019, Erie Transportation filed a letter at Docket No. A-00108419 notifying the Commission that due to the sudden passing of Mr. Mark McEnery, the owner and operator of Erie Transportation, on June 18, 2019, Erie Transportation was voluntarily suspending its common carrier service on June 28, 2019. On August 6, 2019, Erie Transportation filed an Application to Abandon with the Commission at Docket No. A-2019-3012047. The Application to Abandon is pending.

Based on the foregoing, Erie Transportation requests dismissal of the above-captioned complaint. The business has ceased operating, and no net assets are available to defend a prosecution or pay any civil penalties. Additionally, the family members of Mr. McEnery do not have sufficient access at this time to information that would enable them to accurately respond to the allegations in the complaint.

If you have any questions regarding this filing, please contact me at your convenience.

Sincerely,



Karen O. Moury

cc: Jeffrey P. Clapp, via Email (jpclapp@gmail.com)
Kevin J. McEnery, via Email (kjmccenery@aol.com)
Certificate of Service

Verification

I, Karen O. Moury, state that I am an Attorney of Record for Erie Transportation Services, Inc. and that as such I am authorized to make this verification on its behalf. I hereby state that the facts contained in the foregoing Letter are true and correct (or are true and correct to the best of my knowledge, information and belief). I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

August 7, 2019



Karen O. Moury, Esquire

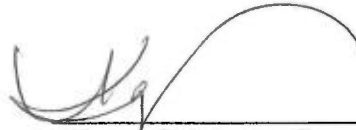
CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Letter upon the person listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

Kourtney L. Myers, Prosecutor
Bureau of Investigation and Enforcement
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
komyers@pa.gov

Date: August 7, 2019



Karen O. Moury, Esquire