



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE
C-2017-2634219

August 12, 2019

VIA ELECTRONIC FILING

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

Re: Pennsylvania Public Utility Commission, Bureau of Investigation
and Enforcement v. Jetway Transport, Inc. t/a Main Line Taxi
Docket No. C-2017-2634219
I&E Exceptions

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Exceptions of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-referenced proceeding. Copies have been served on the parties of record in accordance with the Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Myers", written in a cursive style.

Kourtney L. Myers
Prosecutor
PA Attorney ID No. 316494

Prosecutor for the Bureau of
Investigation and Enforcement

Enclosures

cc: ra-OSA@pa.gov
Honorable Eranda Vero
As per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement,
Complainant

v.

Jetway Transport, Inc. t/a Main Line Taxi,
Respondent

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Docket No. C-2017-2634219

**EXCEPTIONS OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

Kourtney L. Myers
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Dated: August 12, 2019

I. INTRODUCTION

The Initial Decision (“I.D.”) of presiding Administrative Law Judge (“ALJ”) Eranda Vero sustains, in part, the Complaint of the Pennsylvania Public Utility Commission’s (“Commission” or “PUC”) Bureau of Investigation and Enforcement (“I&E”) and modifies, in part, I&E’s requested relief related to the imposition of a civil penalty of \$7,386.¹ Specifically, the presiding ALJ sustained I&E’s Complaint in finding that Jetway Transport, Inc. t/a Main Line Taxi (“Respondent”) violated Section 510(c) of the Public Utility Code (“Code”), 66 Pa.C.S. § 510(c), by failing to pay its assessment for the July 1, 2016 to June 30, 2017 Fiscal Year (“2016-2017 Fiscal Year”) in the amount of \$29,543.² Despite finding that Respondent violated the Code, the ALJ modified I&E’s requested civil penalty of 25% of Respondent’s outstanding assessment or \$7,386 and ordered Respondent to pay a reduced civil penalty of \$4,431.45.³

I&E files these Exceptions to the July 12, 2019 Initial Decision of the ALJ with respect to the \$4,431.45 civil penalty imposed for Respondent’s continuing violation of 66 Pa.C.S. § 510(c). It is I&E’s position that Respondent’s prior and recent compliance history, past Commission decisions in similar situations, and the need to deter future violations of 66 Pa. C.S. § 510(c) support the imposition of the civil penalty of \$7,386 sought in the Complaint. If the Commission denies I&E’s Exceptions and does not modify the ALJ’s I.D., this will send the wrong message to other delinquent utilities that

¹ I.D. at 15.

² Conclusion of Law No. 6.

³ I.D. at 12.

if they repeatedly commit violations of the Commission's regulations and ignore the statutory requirement to pay assessments, this type of misconduct will not be held against them when the Commission levies civil penalties.

II. BACKGROUND

On or about September 1, 2016, the Commission mailed to Respondent an assessment invoice for the 2016-2017 Fiscal Year in the amount of \$29,543.⁴ Respondent's assessment was based on its gross intrastate operating revenues that Respondent reported to the Commission in its 2015 Assessment Report.⁵ Accompanying the assessment invoice was a Notice of Assessment notifying Respondent that its assessment must be paid within thirty (30) days of receipt of the assessment invoice.⁶ On September 12, 2016, Respondent received its 2016-2017 Fiscal Year Assessment Invoice and Notice of Assessment by certified mail.⁷ Respondent did not file an objection to its 2016-2017 Fiscal Year Assessment Invoice.⁸ Respondent was required to pay the assessment by October 12, 2016.⁹ When it became apparent that such payment was not forthcoming, I&E filed a Complaint against Respondent on November 17, 2017, at Docket No. C-2017-2634219, alleging that Respondent violated Section 510(c) of the Code, 66 Pa.C.S. § 510(c), by failing to pay its assessment invoice for the 2016-2017 Fiscal Year of \$29,543. In addition to payment of the outstanding assessment, I&E seeks

⁴ N.T. at 16-18; I&E Exhibit 2.

⁵ N.T. at 9-14; I&E Exhibit 1.

⁶ N.T. at 19-22; I&E Exhibit 3.

⁷ N.T. at 21-25; I&E Exhibit 4.

⁸ N.T. at 21.

⁹ N.T. at 26.

payment of a civil penalty in the amount of \$7,386, which is 25% of Respondent's outstanding assessment. I&E's Complaint also requested that if payment of the outstanding assessment and civil penalty was not made, that the Commission revoke Respondent's Certificates of Public Convenience ("Certificates") at A-00122951 and A-00122951F0002,¹⁰ refer the matter to the Pennsylvania Office of Attorney General for collection, and certify Respondent's automobile registrations to the Pennsylvania Department of Transportation for suspension or revocation. On December 7, 2017, Respondent requested an extension to file an answer to I&E's Complaint by December 19, 2017. On December 13, 2017, the Commission granted Respondent's request for an extension of time to file an answer. Respondent filed Preliminary Objections to I&E's Complaint on December 19, 2017, arguing that I&E failed to adhere to the Commission's requirements set forth in 52 Pa. Code § 5.22(a)(7) in that I&E failed to attach to its Complaint the assessment invoice for the 2016-2017 Fiscal Year, the notice of assessment for the 2016-2017 Fiscal Year, and the certified mailing receipt demonstrating proof of delivery of the assessment invoice and notice of assessment related to the 2016-2017 Fiscal Year. Respondent claimed that the failure to attach such documents formed the basis for a preliminary objection pursuant to 52 Pa. Code § 5.101(a)(3) regarding insufficient specificity of a pleading.

¹⁰ Subsequent to the filing of I&E's Complaint, on November 14, 2018, Respondent's Certificates were cancelled at Docket No. C-2018-3003568. Respondent filed a Petition for Reconsideration from Staff Action ("Petition") on December 12, 2018; however, the Petition was denied by the Commission on June 12, 2019. Although the presiding ALJ, did not address the cancellation of Respondent's Certificates in her I.D., I&E understands that the portion of its requested relief related to the cancellation of Respondent's Certificates is now moot.

On December 28, 2017, I&E filed an Amended Complaint attaching as exhibits the assessment invoice, notice of assessment, and certified mailing receipt related to the 2016-2017 Fiscal Year. On January 17, 2018, Respondent filed an Answer with New Matter to I&E's Complaint. Respondent failed to serve I&E with an electronic mail notice stating that it had filed its Answer with New Matter on the Commission's electronic filing system as required by 52 Pa. Code § 1.54(b)(3)(ii). In its Answer with New Matter, Respondent denied that it failed to pay its assessment and alleged that the assessment was excessive. On February 6, 2018, I&E filed a Reply to New Matter alleging, *inter alia*, that Respondent's assessment for the 2016-2017 Fiscal Year was not excessive because it was based on Respondent's gross intrastate operating revenues that Respondent reported to the Commission in its assessment report for the 2015 calendar year in accordance with 66 Pa.C.S. § 510. I&E also alleged that if Respondent believed its 2016-2017 Fiscal Year assessment was excessive, Respondent had the opportunity to file an objection to the assessment on or before September 8, 2016, however, Respondent failed to do so.

A Hearing Notice was issued on January 14, 2019 scheduling an Initial Call-In Telephonic Hearing in this matter for February 22, 2019. On February 6, 2019, Respondent filed a Motion requesting a continuance of the hearing in this matter. I&E did not object to Respondent's request for a continuance. On February 19, 2019, the ALJ issued an Order denying Respondent's Preliminary Objections and granting its request for a continuance of the scheduled hearing.

A second Call-In Telephonic Hearing Notice was issued scheduling this matter for a hearing to take place on April 1, 2019. By electronic mail dated March 27, 2019, Respondent's counsel indicated that Respondent would not be participating at the telephonic hearing.

The telephonic hearing in this matter convened as scheduled on April 1, 2019. Neither Respondent nor its counsel participated at the hearing. During the hearing, I&E presented uncontested testimony of PUC Chief of Finance and Assessments, Yvonne Hess, and proffered sixteen (16) exhibits into evidence, I&E Exhibits 1, 2, 3, 4, 5A, 5B, 6A, 6B, 7A, 7B, 8A, 8B, 9A, 9B, 10A, and 10B. Prior to the closing of the record, I&E submitted an additional, late-filed exhibit, I&E Exhibit 11, on April 1, 2019. On July 23, 2019, the Commission's Office of Administrative Law Judge issued the I.D. of the presiding ALJ.

I&E's Exceptions follow.

III. SCOPE OF REVIEW

The Commission has the power to disregard and supersede the I.D. Section 335(a) of the Code states that, "on review of the initial decision, the commission has all the powers which it would have in making the initial decision" 66 Pa.C.S. § 335(a). The Commonwealth Court has determined that, "a broader grant of power to the Commission in the disposition of initial decisions in cases it chooses to review can scarcely be imagined." *G.G. & C. Bus Co. v. Pa. Pub. Util. Comm'n*, 400 A.2d 941, 944 (Pa. Cmwlth 1979). *See also City of Philadelphia v. Pa. Pub. Util. Comm'n*, 458 A.2d 1026 (Pa. Cmwlth. 1983). Thus, under this broad scope of review, the Commission may

substitute its own findings of fact and conclusions of law as it sees fit based upon the evidence and record before it. The Commission should exercise its powers under Section 335 of the Code and reject the I.D. with regard to the imposition of a reduced civil penalty of \$4,431.45 as such penalty fails to adequately consider Respondent's prior and recent compliance history with the Commission, civil penalties imposed in prior Commission decisions in similar situations, and the amount of civil penalties necessary to deter future violations.

IV. I&E EXCEPTIONS

A. Respondent's Prior Compliance History Supports the Imposition of a Civil Penalty of 25% of the Outstanding Assessment or \$7,386.

In *Pa. Pub. Util. Comm'n, Bureau of Investigation and Enforcement v. West Side Services, Inc.*, Docket No. C-2015-2494535 (Order entered August 3, 2017), the Commission presented the approach for levying civil penalties in assessment-related cases and provided that a utility's compliance history and the need to deter future violations are important considerations when assessing a civil penalty. In determining whether a utility has a satisfactory compliance record, the Commission noted that it was reasonable to review Commission records for a period of three (3) years prior to the date of the filing of a complaint - up to and including the date of Commission action in the matter before it. *Id.* In conducting such a review, the Commission evaluates, *inter alia*, violations of its assessment requirements at Section 510 of the Code, 66 Pa.C.S. § 510; its insurance requirements at Chapter 32 of the Commission's regulations, 52 Pa. Code, Ch.

32; and its vehicle, service, and driver requirements at Chapter 29 of the Commission's regulations, 52 Pa. Code, Ch. 29. *Id.*

In reviewing Respondent's records for a period of three (3) years prior to the date of the filing of the instant Complaint in this matter, which was November 17, 2017, the presiding ALJ limited her review to one (1) complaint that was filed against Respondent at Docket No. C-2016-2563131.¹¹ I&E filed this complaint against Respondent on August 23, 2016 for allowing one of its drivers to operate a taxicab before Respondent obtained and reviewed the driver's criminal history; for allowing the driver to operate a taxicab when he was neither qualified nor suitable to provide safe transportation to the public due to the driver being a registered sex offender under Megan's Law; and for failing to retain the criminal history of drivers for a period of at least three (3) years in violation of 52 Pa. Code §§ 29.505(a),(c), and (d), respectively.¹² Upon review of this prior complaint, the ALJ found that because "Respondent paid the civil penalty timely and in full," a civil penalty of 15% of the outstanding assessment should be imposed rather than the more stringent 25% of the outstanding assessment civil penalty.¹³

I&E respectfully submits that the ALJ overlooked the complaints that were previously filed against Respondent for violations of Chapter 29 of the Commission's regulations, 52 Pa. Code, Ch. 29, within the three-year review period. On December 8, 2014, I&E filed a complaint against Respondent at Docket No. C-2014-2453523 for

¹¹ I.D. at 12.

¹² I&E Exhibit 10A.

¹³ I.D. at 12.

allowing four (4) drivers to operate taxicabs on fifteen (15) separate occasions while their driver's licenses were suspended in violation of 52 Pa. Code § 29.502.¹⁴ On April 17, 2015, I&E initiated another enforcement action against Respondent at Docket No. C-2015-2470361 for failing to carry a legible, complete log sheet in a taxicab and to furnish safe and reasonable service of facilities for the proper safety of patrons and the public in violation of 52 Pa. Code § 29.313(c) and 66 Pa.C.S § 1501, respectively.¹⁵

Therefore, I&E submits that the presiding ALJ's characterization of Respondent's compliance history is inaccurate because she failed to take into consideration all three (3) of the above-referenced Commission complaints when determining whether Respondent had a satisfactory compliance history. It is I&E's position that Respondent's repeated regulatory violations plainly show that a reduced civil penalty is insufficient to deter future violations.

Additionally, I&E argues that the serious nature of the conduct at issue in the complaints at Docket Nos. C-2014-2453523 and C-2016-2563131 should be taken into consideration when determining Respondent's compliance history because the nature of the offenses demonstrates Respondent's unwillingness to comply with the Code and Commission regulations as well as Respondent's disregard for the safety of its patrons and the public. In *Pa. Pub. Util. Comm'n, Bureau of Investigation and Enforcement v. Jetway Transport Inc. t/a Main Line Taxi*, Docket Nos. C-2010-2320322 and C-2012-2315590 (Order entered August 29, 2013), the Commission determined that

¹⁴ I&E Exhibit 8A.

¹⁵ I&E Exhibit 9A.

Respondent's misconduct of allowing its drivers, in five (5) instances, to operate taxicabs without valid driver's licenses in violation of 52 Pa. Code § 29.502 was conduct of a serious nature. The complaint filed against Respondent at Docket No. C-2014-2453523 demonstrates that Respondent has continued to engage in conduct of a serious nature by repeatedly allowing its drivers to operate taxicabs without valid driver's licenses.

Respondent has also demonstrated its disregard for the safety of its patrons and the public by engaging in conduct of a serious nature when it allowed its driver to operate a taxicab before obtaining the driver's criminal history. In the complaint at Docket No. C-2016-2563131, I&E alleges that the driver assaulted a passenger and that the driver was a registered sex offender. The serious nature of the conduct alleged in the complaints should have weighed toward a finding that Respondent had an unsatisfactory compliance history. However, the ALJ did not consider these proceedings to have an adverse impact on Respondent's compliance history.

B. Respondent's Recent Compliance History Supports the Imposition of a Civil Penalty of 25% of the Outstanding Assessment or \$7,386.

As referenced above, the Commission determined in the *West Side* case that it was reasonable to review Commission records for a period of three (3) years prior to the date of the filing of a complaint - *up to and including the date of Commission action in the matter before it* to determine whether a utility has a satisfactory compliance record. Docket No. C-2015-2494535 (Order entered August 3, 2017). Although the presiding ALJ acknowledges Respondent's failure to pay its 2017-2018 and 2018-2019 Fiscal Year

assessments totaling \$28,760 in the I.D., she mistakenly does not consider these violations when determining whether Respondent has a satisfactory compliance history.¹⁶

In *Pa. Pub. Util. Comm'n., Bureau of Investigation and Enforcement v. Lea C. Morgan*, Docket No. C-2016-2553952 (Order entered April 19, 2018), I&E alleged that the respondent failed to pay its 2015-2016 Fiscal Year Assessment and requested a civil penalty that was 15% of the outstanding balance because, based on the Commission's records, the company did not have any complaints filed against it within the three-year period prior to the filing of the complaint. *Id.* However, upon review of the case, the Commission determined that the company did in fact have an unsatisfactory compliance history when it reviewed the Commission records using the *West Side* approach to levying civil penalties. *Id.* According to the Commission, a review of its records from the period after the complaint was filed and up until the Commission's action in the matter demonstrated that the respondent failed to file assessment reports for the 2015 and 2016 calendar years and that it failed to pay its assessments for the 2015-2016, 2016-2017, and 2017-2018 Fiscal Years. *Id.* The Commission stated that it believed these facts warranted the adjustment of the civil penalty from 15% of the outstanding assessment balance to 25% because the record indicated that the respondent had an unsatisfactory compliance history. *Id.*

In the instant case, a review of the Commission's records, from the period following the filing of the Complaint up until the Commission's action in this matter,

¹⁶ I.D. at 12.

demonstrates that Respondent failed to file an assessment report for the 2017 calendar year; I&E's witness credibly testified that Respondent also failed to pay its assessments for the 2017-2018 and 2018-2019 Fiscal Years totaling \$28,760; and a complaint was filed against Respondent at Docket No. C-2018-3003568 for failing to maintain liability insurance, which resulted in the cancellation of Respondent's Certificates. Therefore, I&E argues that the presiding ALJ did not take into consideration Respondent's recent, unacceptable compliance history.

C. Satisfaction of Prior Prosecutions Should Not Warrant the Imposition of a Lesser Civil Penalty.

I&E respectfully submits that the presiding ALJ erred by taking into consideration the fact that Respondent timely paid a prior civil penalty in satisfaction of the complaint at Docket No. C-2016-2563131, which involved the failure to obtain the criminal history for a driver that was a registered sex offender under Megan's Law, when the ALJ determined that Respondent had a satisfactory compliance history.¹⁷

In *Pa. Pub. Util. Comm'n, Bureau of Investigation and Enforcement v. Luxury Limousine Service, Inc.*, Docket No. C-2016-2549574 (Order entered February 8, 2018), the Commission sustained I&E's requested relief related to payment of a civil penalty of 25% of the respondent's outstanding assessment balance regarding the 2015-2016 Fiscal Year when the respondent made a payment towards its 2015-2016 Fiscal Year Assessment on July 7, 2016. In finding that the utility had an unacceptable compliance history, the Commission reasoned that the respondent failed to timely pay the

¹⁷ I.D. at 12.

Commission's assessments since 2015 even though the respondent made a payment in 2016 and satisfied its outstanding assessments and civil penalties sought in prior complaints. *Id.* Consistent with *Luxury Limousine*, the fact that Respondent paid its civil penalties in prior complaints should not be taken into consideration to determine whether Respondent has a satisfactory compliance history.

D. A Decline in Operating Revenue Should Not Warrant the Imposition of a Lesser Civil Penalty.

I&E respectfully submits that the presiding ALJ mistakenly considered the decline in Respondent's operating revenue for the 2016 calendar year when she reduced I&E's requested civil penalty for Respondent's failure to pay its 2016-2017 Fiscal Year Assessment.¹⁸ Respondent's assessment for the 2016-2017 Fiscal Year was based on the gross intrastate operating revenues that Respondent reported to the Commission in its 2015 Assessment Report in accordance with 66 Pa.C.S. § 510.¹⁹ Similarly, Respondent's assessment for the 2017-2018 Fiscal Year was based on the gross intrastate operating revenues that Respondent reported to the Commission in its 2016 Assessment Report. Therefore, if Respondent did in fact sustain a decline in operating revenue for the 2016 calendar year, then such loss has already been taken into consideration as Respondent's 2017-2018 Fiscal Year Assessment was based upon the revenues that Respondent reported to the Commission in its 2016 Assessment Report. Respondent also had the opportunity to file objections to its assessments for the 2016-2017, 2017-2018, and 2018-

¹⁸ I.D. at 12.

¹⁹ N.T. at 9-14; I&E Exhibit 1.

2019 Fiscal Years if it believed its assessments were inaccurately calculated, however, Respondent failed to do so. Therefore, any decline in Respondent's operating revenue should not be taken into consideration when determining the amount or reasonableness of the requested civil penalty for Respondent's failure to pay its 2016-2017 Fiscal Year Assessment.

E. A Consideration of Commission Decisions in Similar Situations Supports the Imposition of a Civil Penalty of 25% of the Outstanding Assessment Balance or \$7,386.

When reducing the civil penalty in this matter to 15% of the outstanding assessment or \$4,431.45, the ALJ reasoned that "such [a civil penalty] is consistent with civil penalties levied in other cases in which a utility has a history of failure to comply with Commission regulations and the Public Utility Code."²⁰ Although the ALJ notes that Respondent has a history of failing to comply with the Commission's regulations and the Code, the ALJ still reduces the civil penalty to 15% of the outstanding assessment, which is inconsistent with recent Commission decisions.

In support of such modification, the ALJ relied on *Pa. Pub. Util. Comm'n v. Beverly A. Hall and Rich Lengel t/a Lemirage Limousine*, Docket No. C-2012-2315797 (Order entered January 24, 2013) and *Pa. Pub. Util. Comm'n v. Wanish Limousine Service LTD.*, Docket No. C-2014-2459320 (Order entered October 25, 2016).²¹

However, the ALJ's reliance on these cases was improper because both cases failed to

²⁰ I.D. at 12.

²¹ *Id.* at 12-13.

apply the Commission's recent approach to levying civil penalties in assessment-related cases.

In *Beverly Hall*, I&E requested that the respondent pay a civil penalty of 15% of its outstanding assessment balance for failing to pay its assessments for the 2010-2011 and 2011-2012 Fiscal Years. Docket No. C-2012-2315797 (Order entered January 24, 2013). The Commission did not take the respondent's prior and recent compliance history into consideration when levying a civil penalty of 15% of the outstanding assessment balance. *Id.* Therefore, I&E argues that the *Beverly Hall* case is not a Commission decision that is similar to the instant case because it does not apply the *West Side* approach to levying civil penalties in assessment-related cases. Consequently, it was improper for the presiding ALJ to rely on this case to justify why I&E's requested civil penalty in the instant matter should be reduced to 15% of the outstanding assessment.

Similarly, in *Wanish Limousine Service*, I&E requested that the respondent pay a civil penalty of 15% of its outstanding assessment balance for failing to pay its 2011-2012, 2012-2013, and 2013-2014 Fiscal Year Assessments. Docket No. C-2014-2459320 (Order entered October 25, 2016). The ALJ in *Wanish Limousine Service* used the reasoning from *Beverly Hall* to show that a civil penalty that amounted to 15% of the outstanding assessment balance was reasonable and did not take the respondent's prior and recent compliance history into consideration when levying such a civil penalty. *Id.* However, again, I&E argues that *Wanish Limousine Service* is not a Commission decision that is similar to the instant case because it does not apply the *West Side* approach to levying civil penalties in assessment-related cases and was also improperly

relied on by the presiding ALJ to demonstrate that a 15% civil penalty in the instant matter was reasonable.

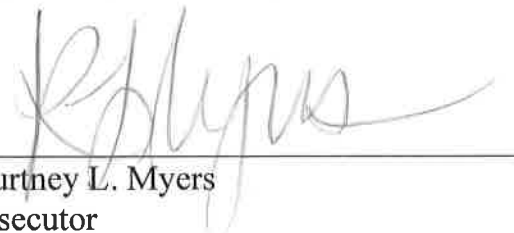
Although the presiding ALJ found “Respondent’s compliance history to be better than the compliance history considered by the Commission in *West Side Services*,”²² I&E submits that Respondent’s compliance history is unsatisfactory similar to the respondent in *West Side*. In the *West Side* case, I&E requested that the respondent pay a civil penalty of 25% of its outstanding assessment balance for failing to pay its 2014-2015 Fiscal Year Assessment. Docket No. C-2015-2494535 (Order entered August 3, 2017). I&E requested such civil penalty due to Respondent’s prior assessment violations. *Id.* The Commission also determined the respondent to have an unacceptable compliance history due to the respondent failing to timely pay its 2012-2013 and 2013-2014 Fiscal Year Assessments and maintain evidence of liability and cargo insurance with the Commission in 2013 and 2016 and levied I&E’s requested civil penalty of 25% of the outstanding assessment balance. *Id.* As mentioned above, Respondent has repeatedly violated the Commission’s regulations, failed to file its 2017 Assessment Report with the Commission, and failed to pay its 2017-2018 and 2018-2019 Fiscal Year Assessments totaling \$28,760, which is unacceptable.

²² I.D. at 12.

V. CONCLUSION

For the reasons set forth above, I&E respectfully submits that a civil penalty of 25% of Respondent's outstanding assessment for the 2016-2017 Fiscal Year or \$7,386 is consistent with civil penalties sought by I&E and approved by the Commission in prior, similar matters and necessary to deter future violations.

Respectfully submitted,



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Dated: August 12, 2019

Pennsylvania Public Utility Commission :
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Complainant :

Docket No. C-2017-2634219

v. :

Jetway Transport, Inc. t/a Main Line Taxi, :
Respondent :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Notification by First Class Mail and Electronic Mail:

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Dated: August 12, 2019