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October 30, 2019

RECEIVED
2019 NOV -4 AM 9:38
PA PUC
SECRETARY'S BUREAU

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

**Re: Application of Kris Eckerl, t/a
Michael's Moving and Storage
PUC Docket No.: A-2014-2429336**

Dear Ms. Chiavetta:

Please be advised that this office represents Matheson Transfer Company and Cadden Brothers Moving & Storage, Inc., Protestants of record in the above matter. By letter dated June 27, 2019, a copy of which I enclose for ease of reference, I informed the Commission of an administrative breakdown in the Bureau of Technical Utility Services involving the issuance of a Certificate of Public Convenience to the above individual.

I have not received any action by the Commission to date. Please advise what action was taken in response to my letter.

Kindly acknowledge receipt of this request by time-stamping the enclosed copy of this letter and returning to me in the self-addressed envelope provided.

Respectfully submitted,

Richard T. Mulcahey, Jr.

RTMJR/hs

Enclosure

cc: Matheson Transfer Company
Cadden Brothers Moving & Storage, Inc.



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NOV - 4 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

June 27, 2019

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

**Re: Application of Kris Eckerl, t/a
Michael's Moving and Storage
PUC Docket No.: A-2014-2429336**

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2019 JUL - 1 AM 10:34
PA PUC
SECRETARY'S BUREAU

Dear Ms. Chiavetta:

Please be advised that this office represents Matheson Transfer Company and Cadden Brothers Moving & Storage, Inc., Protestants of record in the above matter. By Order dated March 11, 2016, this matter was referred to the Bureau of Technical Utility Services for processing, enclosed is a copy of the Order for your easy reference. Please note that the Applicant requested authority to transport household goods in use *between points in Pike County* (emphasis added).

During a recent call to enforcement regarding this carrier's activities outside of Pike County, my clients were informed by a Commission agent that Mr. Eckerl had state wide authority. Enclosed is a copy of his Certificate of Public Convenience indicating such. After a reasonable investigation, we believe that no subsequent application for authority was filed by Mr. Eckerl for the expanded rights. Furthermore, I specifically requested by letter dated March 15, 2016, a copy enclosed, to remain a party of record to receive copies of all Commission action in this case. I received nothing.

Clearly the Commission's Bureau of Technical Utility Services issued the Certificate of Public Convenience in error. Such action apparently was due to an administrative break down at the Bureau. Moreover, the erroneous action by the Bureau has denied my clients procedural and substantive due process in violation of Pennsylvania law, its Constitution and the Constitution of the United States.

Accordingly, I am requesting that this Commission rescind the current Certificate of Public Convenience issued to Mr. Eckerl and reissue a Certificate for authority to transport household goods in use only between points in Pike County.

Rosemary Chiavetta, Secretary
July 27, 2019

Page 2

Kindly acknowledge receipt of this request by time-stamping the enclosed copy of this letter and returning to me in the self-addressed envelope provided.

Respectfully submitted,

Richard T. Mulcahey, Jr.

RTMJR/hs

Enclosures

cc: James J. Scanlon, Esquire (w/encl)
Matheson Transfer Company (w/encl)
Cadden Brothers Moving & Storage, Inc. (w/encl)

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2019 NOV -4 AM 9:39
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