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2020 FEB 11 AM 9:52

February 10, 2020

PA PUC  
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C-2019-3015167

A-00122208

**PETITION FOR RECONSIDERATION FROM STAFF ACTION**

**Secretary  
PA Public Utility Commission  
400 North Street  
Harrisburg, PA 17120**

**Re:HARRISBURG CITY CAB, INC., T/D/B/A HARRISBURG CITY CAB AND  
LIBERTY CAB**

I disagree with the determination to cancel our PUC authority. I will explain the followings reasons why I ask that you please reconsider your decision:

1. We had proper taxi insurance which I have included with this documentation as Exhibit (a) we have not had a lapse of insurance at any time and we have been properly insured and remain properly insured.
2. On December 19th 2019 We started a new policy with Progressive Insurance. As far as we knew. They had submitted the e-form.
3. I had received a letter from the PUC. But I had assumed that our insurance company had straightened out the situation because this had happened in Prior years. I had assumed that they had sent in the e-form. I ask can you please check your files. I got this letter at least 100 times in the 12 years that I have been open. So I didn't think much about it. Like I had done before I had contacted my insurance broker and he said he would handle it. Like he has always done like in the past. This problem was always remedied by the insurance company. I didn't realize that it hadn't been resolved. I would never operate my company without being properly insured. I had contacted our insurance broker Jeff Schmid and I was lead to believe that the e-form was filed.
4. I just ask that you please examine the evidence. I plead with you to please see that we had insurance. This is my lively hood. This is how I provide for my family. I ask please don't take my little license from me.

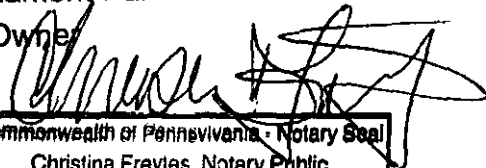
Thanks for your time and attention to this matter.

Sincerely,



Lamont Palmer

Owner



Commonwealth of Pennsylvania - Notary Seal  
Christina Freytes, Notary Public  
Dauphin County  
My commission expires March 27, 2022  
Commission number 1262487

2/10/2020

2/10/2020

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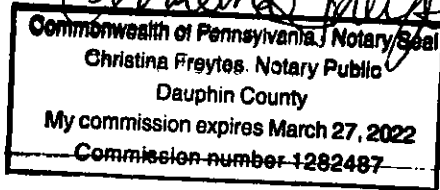
**VERIFICATION**

I, Lamont Palmer, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. 4904 (relating to unsworn falsification to authorities).

*Lamont Palmer*  
*Christina Freytes*

Date: 2-11-20

2/11/2020



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FINANCIAL ASSOCIATES  
4240 GREENSBURG PIKE  
PITTSBURGH, PA 15221

**PROGRESSIVE**  
COMMERCIAL

Named insured

HARRISBURG CITY CABS, INC  
1916 NORTH 4TH ST  
HARRISBURG, PA 17102

**Policy number: 01551152-0**

Underwritten by:

United Financial Casualty Company

January 22, 2020

Policy Period: Dec 19, 2019 - Dec 19, 2020

Page 1 of 2

**progressiveagent.com**

**Online Service**

Make payments, check billing activity, print policy documents, or check the status of a claim.

**1-412-351-5800**

**FINANCIAL ASSOCIATES**

Contact your agent for personalized service.

**1-800-444-4487**

For customer service if your agent is unavailable or to report a claim.

## Commercial Auto Insurance Coverage Summary

This is your Declarations Page  
Your policy information has changed

Your coverage began the later of December 19, 2019 at 12:01 a.m. or at the time your application is executed on the first day of the policy period. This policy period ends on December 19, 2020 at 12:01 a.m.

This coverage summary replaces your prior one. Your insurance policy and any policy endorsements contain a full explanation of your coverage. The policy limits shown for an auto may not be combined with the limits for the same coverage on another auto, unless the policy contract allows the stacking of limits. The policy contract is form 6912 (06/10). The contract is modified by forms 1652PA (03/11), 4881PA (03/11), 4852PA (10/04) and Z228 (01/11).

The named insured organization type is a corporation.

### **COLLISION COVERAGE FOR RENTAL VEHICLES**

**IF THIS POLICY PROVIDES COLLISION COVERAGE ON A PRIVATE PASSENGER VEHICLE, IT WILL APPLY TO A PRIVATE PASSENGER VEHICLE YOU RENT IF THE RENTAL IS COVERED AS A "TEMPORARY SUBSTITUTE AUTO" AS PROVIDED FOR IN PART II OF THIS POLICY.**

### **Policy changes effective December 19, 2019**

Premium change: \$360.00

The changes shown above will not be effective prior to the time the changes were requested.

**Outline of coverage**

Description	Limits	Deductible	Premium
Liability To Others			\$3,548
Bodily Injury Liability	\$15,000 each person/\$30,000 each accident		
Property Damage Liability	\$5,000 each accident		
Uninsured Motorist	Rejected		-
Underinsured Motorist	Rejected		-
Basic First Party Benefit - Full Tort			116
Medical Expense Benefit Without Workers Comp	up to \$25,000		
Extraordinary Medical Benefits	Rejected		-
Income Loss Benefit Without Workers Comp	up to \$1,000 each month/\$15,000 maximum		26
Funeral Expense Benefits	Rejected		-
Accidental Death Benefits	Rejected		-
<b>Subtotal policy premium</b>			<b>\$3,690</b>
Fees			35
<b>Total 12 month policy premium and fees</b>			<b>\$3,725</b>

**Rated driver**

- LAMONTE PALMER JR

**Auto coverage schedule**

- 2012 Ford Fusion**  
VIN: 3FAHP0HA2CR345861      Garaging Zip Code: 17102      Radius: 50

Liability Premium	Liability	PIP	Income Loss	Auto Total
	\$3,548	\$116	\$26	<b>\$3,690</b>

**Premium discount**

Policy	Business Experience
01551152-0	Business Experience

**Penalty for Insurance Fraud**

Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals for the purpose of misleading, information concerning any fact material thereto commits a fraudulent insurance act, which is a crime and subjects such person to criminal and civil penalties.

**Rejected Coverage**

This policy does not provide protection against damages caused by uninsured or underinsured motorists.

**Company officers**

*Kenneth Baile*

President

*Patricia H. Conroy*

Secretary

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