

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition for
Reconsideration
Pursuant to
52 Pa. Code § 5.44**

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Docket No: A-2019-3012511

**PETITION FOR
RECONSIDERATION PURSUANT
TO 52 PA. CODE § 5.44**

AND NOW comes the Petitioner, WHC PA, LLC by and through its attorneys, Ray F. Middleman, Esq. and Eckert Seamans Cherin & Mellott, LLC, who submit this within Petition for Reconsideration Pursuant to 52 Pa. Code § 5.44 as further set forth below:

1. On or about December 3, 2019, the Commission approved the Petitioner's application for the Transfer of Limousine Authority from Airport Limousine Service, Inc. to Petitioner at Docket No. A-2019-3012511.

2. With the timely assistance of Commission Staff and, after an extension of time to accommodate counsel for the Petitioner, an appropriate tariff and all necessary documentation was filed within the required time frame—with one exception.

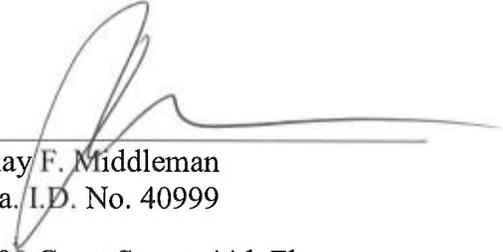
3. Apparently, for reasons unknown by counsel and outside the control of the Petitioner, the required Form E was filed by the Petitioner's insurance carrier late (beyond the deadline) and the above Application for Transfer was dismissed thereafter.

4. It is believed that the Commission now has the required Form E from the appropriate Insurance Carrier and that the Application can be processed immediately.

WHEREFORE, WHC respectfully requests that the Commission reconsider its dismissal of the Transfer Application at Docket A-2019-3012511 and permit said transfer to proceed.

Respectfully submitted,

ECKERT SEAMANS
CHERIN & MELLOTT, LLC



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Dated: March 17, 2020