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March 27, 2020

Secretary Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA.17105-3264

**Re: Pa. P.U.C. v. Metro Transportation, LLC
Docket No. C-2020-3019129**

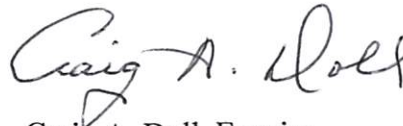
Answer of Metro Transportation, LLC

Dear Secretary Chiavetta:

Appended hereto is the Answer of Metro Transportation, LLC (“Metro”) to the complaint of the Bureau of Investigation and Enforcement. If you have any questions, please feel free to call.

Very truly yours,

REGER RIZZO & DARNALL LLP



Craig A. Doll, Esquire
Debra L. Roscioli, Esquire

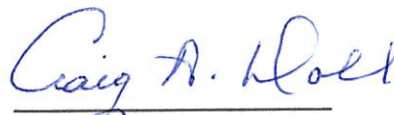
CAD/dim
Enclosures
cc: Metro Transportation, LLC

expired. Thus, Metro has had continuous insurance coverage. It is denied that the imposition of any fine is appropriate. See attached Reissuance Notice.

5. Denied. As stated in response to the allegations contained in paragraphs 1 and 3 that no violation of the Public Utility Code or the Commission's regulations has occurred.

WHEREFORE, Metro Transportation LLC requests that the Commission dismiss the above captioned complaint.

Respectfully Submitted,



Craig A. Doll, Esquire
Debra L. Roscioli, Esquire
REGER RIZZO & DARNALL LLP

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Cdoll76342@aol.com

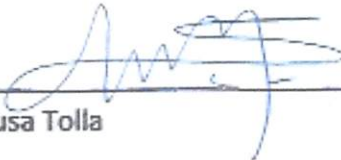
Attorney I.D. # 22814

Attorney for Metro Transportation, LLC

Dated: March 27, 2020

AFFIDAVIT

I, Kusa Tolla, being duly sworn according to law, depose and say that I am authorized to make this affidavit on behalf of Metro Transportation, being the holder of the office of President, and that the facts set forth are true and correct to the best of my knowledge, information and belief and that Metro Transportation LLC expects to be able to prove the same at any hearing hereof


Kusa Tolla

Sworn and subscribed before me
This 26th day of March, 2020

STATE OF Pennsylvania
COUNTY OF Lancaster
SUBSCRIBED AND SWORN TO BEFORE ME
THIS 26th DAY OF March, 2020
BY Kusa Tolla
Minh V. Au
NOTARY PUBLIC

Commonwealth of Pennsylvania-Notary Seal
Minh V Au, Notary Public
Lancaster County
My Commission Expires September 17, 2022
Commission Number 1285715

AMERICAN SERVICE INSURANCE
(847) 472-6700
953 AMERICAN LANE., 3RD FLOOR
SCHAUMBURG, IL 60173
REINSTATEMENT NOTICE

Named Insured & Mailing Address:

METRO TRANSPORTATION LLC
915 HAMILTON STREET
#278
ALLENTOWN PA 18101

Producer: 90890

EXQUIZIT INSURANCE SERVICES, LLC
2720 EAST ALLEGHENY AVENUE, FLOOR 1
PHILADELPHIA PA 19134

Policy No.: CA57599P2019
Type of Policy: AUTO LIABILITY AND PHYSICAL DAMAGE

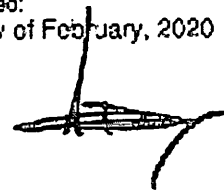
You recently received a notice advising this policy was being cancelled effective 02/27/2020.

This notice is to advise that the policy is being reinstated without lapse in coverage.

Named Insured

METRO TRANSPORTATION LLC
915 HAMILTON STREET
#278
ALLENTOWN PA 18101

Date Mailed:
21st day of February, 2020



SCOTT WEIRNEY