

**KEYSTONE CAB SERVICE, INC.**  
2304 Walnut Street  
Harrisburg, PA 17103

August 10, 2020

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

RE: Reading Checker Cabs, LLC  
Docket No. A-2020-3020872

Dear Secretary Chiavetta:

Please find enclosed an original and one (1) copy of Keystone Cab Service, Inc.'s protest of Reading Checker Cabs, LLC's Application to Begin Service. Please file the original and time stamp the copy and return one (1) to me in the enclosed self-addressed stamped envelope. Thank you for your time and consideration.

Sincerely,



Maher Saber

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AUG 13 2020

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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SECRETARY'S BUREAU~~



5. Applicant failed to attach information to its application that would indicate how Applicant intends to operate, thus Protestant believes and therefore avers that Applicant does not possess the requisite technical fitness to provide the proposed service.

6. Applicant failed to attach information to its application that would indicate how Applicant intends to comply with the Commission's driver and vehicle safety regulations and service standards in Chapter 29 (relating to motor carriers of passengers), thus Protestant believes and therefore avers that Applicant does not possess the requisite technical fitness to provide the proposed service.

7. Applicant failed to attach information to its application that would indicate how Applicant intends to secure sufficient and continuous insurance coverage for all vehicles to be used or useful in the provision of service to the public, thus Protestant believes and therefore avers that Applicant does not possess the requisite technical fitness to provide the proposed service.

8. Applicant has submitted no evidence indicating that Applicant can meet the criteria in 52 Pa. Code § 41.14, thus approval of the Application is not necessary or proper for the service, accommodation, convenience, or safety of the public and would be contrary to public interest.

9. Protestant is unaware of any restrictive amendment that would adequately protect Protestant's interest to the point where they will withdraw their Protest. However, Protestant is open and willing to negotiate such an agreement.

10. Regarding any hearing on this matter, pursuant to Pennsylvania Public Utility Code 66 Pa. C.S. § 333(c), demand is made upon Applicant to furnish to Protestant a list of the names and addresses of any witnesses, along with names and addresses of any

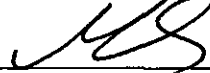
entity that the witnesses may represent and the subject matter of the witness's testimony.

This is a continuing request and is applicable to all witnesses to be called.

WHEREFORE, Protestant, Keystone Cab Service, Inc., respectfully requests that this honorable Commission deny the Application of Reading Checker Cabs, LLC.

Date: 8/8/20

Respectfully submitted,



\_\_\_\_\_  
Maher Saber, President  
Keystone Cab Service, Inc.

# EXHIBIT A

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SECRETARY'S BUREAU

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

**Public Meeting held May 23, 2002**

**Commissioners Present:**

- Glen R. Thomas, Chairman**
- Robert K. Bloom, Vice-Chairman**
- Aaron Wilson, Jr.**
- Terrance J. Fitzpatrick**
- Kim Pizzigrilli**

**Application of Keystone Cab Service, Inc., a Pennsylvania corporation, for the right to begin to transport, as a common carrier, persons upon call or demand, in the county of Dauphin.**

**A-00118552**

**J. Bruce Walter for Applicant**

\_\_\_\_\_

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**ORDER**

**BY THE COMMISSION:**

**This matter comes before the Commission on an application filed November 30, 2001. Public notice of the application was given in the Pennsylvania Bulletin of January 26, 2002. No protests were filed.**

**The application is certified to the Commission for its decision without oral hearing. The record consists of a verified statement entered by the applicant and thirty-two supporting statements.**

**DISCUSSION AND FINDINGS:**

**Maier Seber, President of Keystone Cab Service, Inc. (Keystone or applicant) entered a verified statement on its behalf. He is presently managing a computer consulting company. Mr. Seber plans on hiring a manager/dispatcher to run the day to day operations of the cab business. A list of possible manager/dispatcher candidates was included with the applicant's statement. Each of the candidates has numerous years of experience in the transportation industry and is familiar with the Dauphin County area.**

**Keystone is domiciled at 29 Carolyn Street, Harrisburg, Dauphin County. This location will be used initially as the office and garage/parking area. Various other sites are under consideration for use as an office/garage combination. A radio system will be used for communication and dispatch.**

**The applicant will begin service with three to five vehicles. It expects to acquire another five to ten vehicles as business picks up. Mr. Seber has submitted a financial statement dated March 31, 2002, showing total assets of \$234,481.00, and total liabilities of \$6,021.00.**

**Thirty-two supporting statements have been entered. These statements are from individuals in the proposed service area. These statements support the need for taxi service to and from destinations in the proposed service area, as well as the need for service from the proposed service area to other points in Pennsylvania, and vice versa. The frequency of the trips varies from once a week to ten trips a month.**

**After complete review of the record, we find:**

- 1. The applicant has the equipment and financial fitness to provide the proposed service.**
- 2. Approval of the application is necessary for the accommodation and convenience of the public; THEREFORE,**

**IT IS ORDERED: That the application be and is hereby approved granting the following right:**

**To transport, as a common carrier, persons upon call or demand, in the county of Dauphin.**

**IT IS FURTHER ORDERED: That the applicant shall not engage in any transportation authorized by this order until the following is submitted to the Commission:**

1. **Form E evidence of Bodily Injury and Property Damage Liability Insurance.**
2. **A tariff establishing just and reasonable rates.**

**IT IS FURTHER ORDERED:** That upon compliance with the requirements herein before set forth, a certificate shall issue evidencing the Commission's approval of the right to operate as above determined.

**IT IS FURTHER ORDERED:** That the authority granted herein to the extent that it duplicates authority now held by or subsequently granted to the applicant, shall not be construed as conferring more than one operating right.

**IT IS FURTHER ORDERED:** That in the event the applicant has not, on or before sixty (60) days from the date of the service of this order, complied with the requirements hereinbefore set forth, the application shall be dismissed without further proceedings.

**BY THE COMMISSION,**

James J. McNulty  
Secretary

(SEAL)

**ORDER ADOPTED: May 23, 2002**

**ORDER ENTERED: May 24, 2002**

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17103-3265

Public Meeting held May 22, 2003

**Commissioners Present:**

**Terrance J. Fitzpatrick, Chairman**  
**Robert K. Bloom, Vice-Chairman**  
**Aaron Wilson, Jr.**  
**Glen R. Thomas**  
**Kim Pizzigrilli**

Application of Keystone Cab Service, Inc.,  
a Pennsylvania Corporation, for amendment  
to its common carrier certificate: **SO AS TO**  
**PERMIT** the transportation of persons upon  
call or demand in the counties of Cumberland,  
Lebanon, Perry and York.

A-00118552  
P.1  
Am-A

**ORDER**

**BY THE COMMISSION:**

This matter comes before the Commission on an application filed  
September 10, 2002. Public notice of the application was given in the Pennsylvania Bulletin of  
November 16, 2002. No protests were filed.

The application is certified to the Commission for its decision without oral  
hearing. The record consists of a verified statement entered by the applicant and twenty-nine  
supporting statements.

**DISCUSSION AND FINDINGS**

Keystone Cab Service, Inc. (Keystone or applicant) is domiciled at 527 B North  
Cameron Street, Harrisburg, Dauphin County. The applicant has a fully equipped facility at 620  
South 13<sup>th</sup> Street, Harrisburg, which provides garage and office space. The office has seven  
phone lines; six dedicated for service calls and the other for faxes. Keystone is presently  
certificated to provide taxi service in Dauphin County. The applicant has a Form E, evidence of  
insurance, on file with the Commission to cover its current operations; however, we will require  
the filing of a new Form E, evidence of insurance, to cover the expansion of territory.

On March 14, 2003, Chairman Thomas signed an Emergency Order authorizing Keystone to provide taxi service in the counties of Adams, Perry and York. The applicant has a permanent application pending for Adams County.

Keystone performs routine inspections on the equipment to ensure it is safe and reliable. The applicant has twenty-five vehicles available for use. Drivers are given an orientation and training program with special emphasis on safety.

The applicant has submitted a financial statement in the form of a balance sheet dated April 7, 2003. It shows current assets of \$73,500.00, long term assets of \$220,500.00, current liabilities of \$32,000.00, no long term liabilities, leaving owner's equity of \$264,000.00.

Twenty-nine supporting statements have been entered from individuals in the counties of Cumberland, Lebanon, Perry and York. Each one supports a personal need for call or demand service.

After complete review of the record, we find:

1. The applicant has the experience, vehicles and fitness to provide the proposed service.
2. Approval of the application is necessary for the accommodation and convenience of the public; **THEREFORE,**

**IT IS ORDERED:** That the unopposed application be and is hereby approved so that the certificate issued July 15, 2002, shall be amended to include the following right:

To transport, as a common carrier, persons upon call or demand in the counties of Cumberland, Lebanon, Perry and York.

**IT IS FURTHER ORDERED:** That applicant shall submit the following to the Commission:

1. A Form E, as evidence of bodily injury and property damage liability insurance.
2. An acceptable tariff.

**IT IS FURTHER ORDERED:** That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the applicant, shall not be construed as conferring more than one operating right.

**IT IS FURTHER ORDERED:** That in the event said applicant has not, on or before sixty (60) days from the date of the service of this order, complied with the requirements heretofore set forth, the application shall be dismissed without further proceedings.

**BY THE COMMISSION,**

**James J. McNulty**  
Secretary

**(SEAL)**

**ORDER ADOPTED: May 22, 2003**

**ORDER ENTERED: May 30, 2003**

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17165-3265**

**Public Meeting held August 21, 2003**

**Commissioners Present:**

**Terrance J. Fitzpatrick, Chairman  
Robert K. Bloom, Vice-Chairman  
Aaron Wilson, Jr.  
Glen R. Thomas  
Kim Pizzigrilli**

Application of Keystone Cab Service, Inc.,  
a Pennsylvania Corporation, for the additional  
right to transport, as a common carrier, persons  
in airport transfer service, from points in the  
counties of Adams, Cumberland, Dauphin,  
Lebanon, Perry, and York, to the Harrisburg  
International Airport, located in Dauphin  
County, and the Capital City Airport, located  
in Cumberland County.

**A-00118552  
F.2**

**ORDER**

**BY THE COMMISSION:**

This matter comes before the Commission on an application filed  
April 23, 2003. Public notice of the application was given in the Pennsylvania Bulletin of  
May 17, 2003. No protests were filed.

The application is certified to the Commission for its decision without oral  
hearing. The record consists of a verified statement entered by the applicant and thirty-four  
supporting statements.

**DISCUSSION AND FINDINGS**

Keystone Cab Service, Inc. (Keystone or applicant) is domiciled at 620 South 13<sup>th</sup>  
Street, Harrisburg, Dauphin County. The applicant has a fully equipped facility which provides  
garage and office space. The office has seven phone lines; six dedicated for service calls and the  
other for faxes. Keystone is presently certificated to provide taxi service in the counties of

Cumberland, Dauphin, Lebanon, Perry, and York. The applicant has a Form E, evidence of insurance, on file with the Commission to cover its current operations; however, we will require the filing of a new Form E, evidence of insurance, to cover the new class of service.

Keystone performs routine inspections on the equipment to ensure it is safe and reliable. The applicant has twenty-five vehicles available for use. Drivers are given an orientation and training program with special emphasis on safety.

The applicant has submitted a financial statement in the form of a balance sheet dated April 7, 2003. It shows current assets of \$73,500.00, long term assets of \$220,500.00, current liabilities of \$32,000.00, no long term liabilities, leaving owner's equity of \$264,000.00.

Thirty-four supporting statements have been entered from individuals in the counties of Adams, Cumberland, Dauphin, Lebanon, Perry and York. Each one supports a personal need for airport transfer service.

After complete review of the record, we find:

1. The applicant has the experience, vehicles and fitness to provide the proposed service.
2. Approval of the application is necessary for the accommodation and convenience of the public; **THEREFORE,**

**IT IS ORDERED:** That the unopposed application be and is hereby approved to include the following additional right:

To transport, as a common carrier, persons in airport transfer service, from points in the counties of Adams, Cumberland, Dauphin, Lebanon, Perry, and York, to the Harrisburg International Airport, located in Dauphin County, and the Capital City Airport, located in Cumberland County.

**IT IS FURTHER ORDERED:** That applicant shall submit the following to the Commission:

1. A Form E, as evidence of bodily injury and property damage liability insurance.
2. An acceptable tariff.

**IT IS FURTHER ORDERED:** That upon compliance with the requirements herein before set forth, a certificate shall issue evidencing the Commission's approval of the right to operate as above determined.

**IT IS FURTHER ORDERED:** That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the applicant, shall not be construed as conferring more than one operating right.

**IT IS FURTHER ORDERED:** That in the event said applicant has not, on or before sixty (60) days from the date of the service of this order, complied with the requirements hereinbefore set forth, the application shall be dismissed without further proceedings.

**BY THE COMMISSION,**

James J. McNulty  
Secretary

**(SEAL)**

**ORDER ADOPTED:** August 21, 2003

**ORDER ENTERED:** August 27, 2003

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

**Public Meeting held October 30, 2003**

**Commissioners Present:**

**Terrance J. Fitzpatrick, Chairman  
Robert K. Bloom, Vice-Chairman  
Glen R. Thomas  
Kim Pizzigrilli  
Wendell F. Holland**

**Application of Keystone Cab Service, Inc., for  
amendment to its common carrier certificate  
SO AS TO PERMIT the transportation of persons  
upon call or demand in the county of Adams.**

**A-00118552  
F. 1  
Am-B**

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**ORDER**

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**BY THE COMMISSION:**

**This matter comes before the Commission upon applications for permanent and temporary authority filed April 2, 2003. Public notice of the applications were given in the Pennsylvania Bulletin of May 10, 2003. No protests were filed.**

**The unopposed applications are certified to the Commission for its decision without oral hearing. The record consists of a verified statement of applicant and five statements in support of the application.**

**DISCUSSION AND FINDINGS:**

**Keystone Cab Service, Inc. (Keystone or applicant) is domiciled at 620 South 13<sup>th</sup> Street, Harrisburg, Dauphin County. The applicant has a fully equipped facility which provides parking and office space. The office has seven phone lines for service calls. Keystone is presently certificated to provide taxi service in Cumberland,**



2. A tariff establishing just and reasonable rates.

**IT IS FURTHER ORDERED:** That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the applicant, shall not be construed as conferring more than one operating right.

**IT IS FURTHER ORDERED:** That in the event said applicant has not, on or before sixty (60) days from the date of the service of this order, complied with the requirements hereof set forth, the application shall be dismissed without further proceedings.

**IT IS FURTHER ORDERED:** That the temporary authority application filed in this proceeding and is hereby dismissed as moot.

**BY THE COMMISSION,**

James J. McNulty  
Secretary

(SEAL)

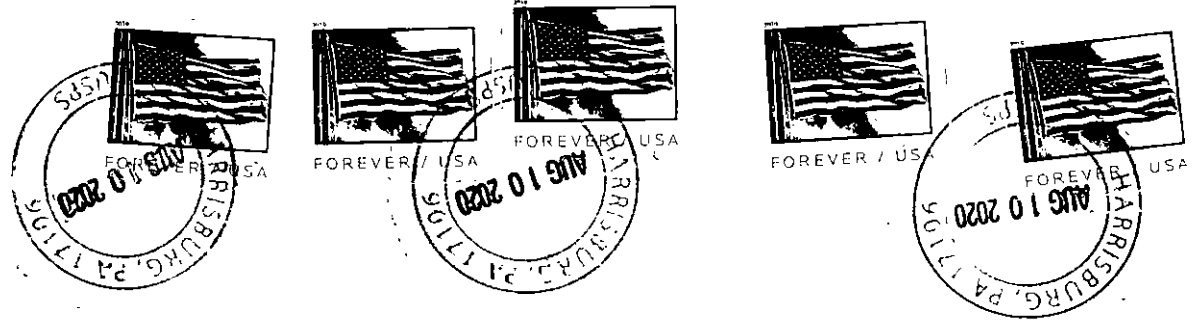
**ORDER ADOPTED** October 30, 2003

**ORDER ENTERED** November 3, 2003





Keystone Cab  
2304 Walnut St.  
HBG PA 17103



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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
400 North St.  
Harrisburg PA 17120