

Reading City Cab, LLC  
2304 Walnut Street  
Harrisburg, PA 17103

August 13, 2020

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

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

Dear Secretary Chiavetta:

Please find enclosed an original and one (1) copy of Reading City Cab, LLC'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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PA PUC  
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.

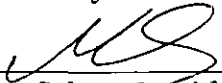
10. Regarding any hearing on this matter, pursuant to Pennsylvania Public Utility Code 66 Pa. C.S. § 333(c), demand is made upon Applicant to furnish to Protestant a list of the names and addresses of any witnesses, along with names and addresses of any

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, Reading City Cab, LLC, respectfully requests that this honorable Commission deny the Application of Reading Checker Cabs, LLC.

Date: 8/7/20

Respectfully submitted,

  
\_\_\_\_\_  
Maher Saber, President  
Reading City Cab, LLC

# EXHIBIT A

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**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

**IN THE MATTER OF: A-6318426**

*Application of Reading City Cab, LLC, 620 South 13<sup>th</sup> Street, Harrisburg, Dauphin County PA 17104  
(717) 773-5452, to transport, as a common carrier, persons, upon call or demand, in the counties of  
Berks and Lancaster, A-2016-2524649*

**EFFECTIVE DATE: September 11, 2017**

**The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has found and determined that the granting of the application is proper for the convenience and safety of the public and hereby issues to the applicant this CERTIFICATE OF PUBLIC CONVENIENCE evidencing the Commission's approval to operate.**

***In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION  
has caused these presents to be signed and sealed, and duly attested by its Secretary  
at its office in the city of Harrisburg this 11<sup>th</sup> day of September, 2017***

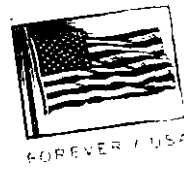


**Secretary**





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2304 Walnut St.  
HBG PA 17103



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Harrisburg, PA 17120