

**Express Taxi, LLC
2304 Walnut Street
Harrisburg, PA 17103**

August 12, 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 Express Taxi, 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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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, Express Taxi, LLC, respectfully requests that this honorable Commission deny the Application of Reading Checker Cabs, LLC.

Date: 8/8/20

Respectfully submitted,



Maher Saber, President
Express Taxi, LLC

EXHIBIT A

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**PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

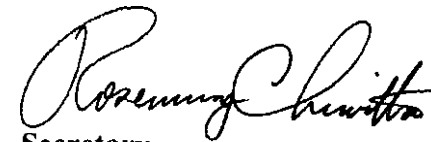
IN THE MATTER OF : A-6317546

Application of Express Taxi, LLC 2304 WALNUT STREET HARRISBURG, PA 17103 717-773-5452 for the right to provide taxi service between points in the Counties of Berks and Lancaster to points in Pennsylvania and return A-2015-2475767

EFFECTIVE DATE: May 25, 2016

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, 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 25th day, of May, 2016.


Secretary

Express Taxi LLC
2304 Walnut St.
H3G PA 17103



FOREVER / USA



FOREVER / USA



FOREVER / USA



FOREVER / USA

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