

Best Taxi, LLC
2304 Walnut Street
Harrisburg, PA 17103

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2020 AUG 20 AM 7:42

PA PUC
SECRET - PUBLIC ID: 111
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 Best 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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of : Commission Docket No.
Reading Checker Cabs, LLC : A-2020-3020872

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OFFICE OF THE CLERK
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Protestant, Best Taxi, LLC, (“Protestant”), pursuant to 52 Pa. Code § 3.381, filing this Protest of the Reading Checker Cabs, LLC (“Applicant”) for authority to provide transportation, as a common carrier, by motor vehicle, persons in call or demand, in the Counties of Berks, Dauphin, Lebanon, Luzerne and Schuylkill. In support thereof, Protestant submits the following:

1. The name and address of Protestant is:

Best Taxi, LLC,
2304 Walnut Street
Harrisburg, PA 17103

2. Applicant has filed an Application with the Public Utility Commission (the “Commission”) for the right to begin to transport, as a common carrier, by motor vehicle, persons in call or demand, in the Counties of Berks, Dauphin, Lebanon, Luzerne and Schuylkill.

3. Protestant Best Taxi, LLC, holds authority of the Commission in conflict with the authority sought by Applicant. Protestant’s authority is at Docket No. A-6318529.

4. Applicant failed to attach any financial information, other than the statement of assets and liabilities, to its application that would indicate Applicant’s financial fitness, thus Protestant believes and therefore avers that Applicant does not possess the requisite financial fitness to provide the proposed service.

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.

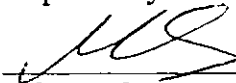
10. Regarding any hearing on this matter, pursuant to Pennsylvania Public Utility Code 66 Pa. C.S. § 333(c), demand is made upon Applicant to furnish to Protestant a list of the names and addresses of any witnesses, along with names and addresses of any

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

Date: 8/12/20

Respectfully submitted,



Maher Saber, President
Best Taxi, LLC

EXHIBIT A

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PA BUC
SECRETARY'S OFFICE/BUREAU

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION**


IN THE MATTER OF: A-6318529

Applications for Common Carrier Rights of Best Taxi, LLC, 2304 Walnut Street, Harrisburg, Dauphin County, PA 17103. (717) 773-5452. To transport, as a common carrier, by motor vehicle, persons, upon call or demand, in the counties of Dauphin and Cumberland. A-2016-2529890

EFFECTIVE DATE: March 24, 2017

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 24th day of March, 2017.


Secretary

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of : Commission Docket No.:
Reading Checker Cabs, LLC : A-2020-3020872

VERIFICATION

I, Maher S. Ahmed, General Manager/President for Protestant, hereby verify that the statements made in the foregoing Protest are true and correct to the best of my knowledge, information and belief. I understand that the statements in the foregoing document are made subject to the penalties of 18 Pa.C.S. §4909 relating to unsworn falsification to authorities.

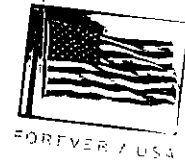
Date 8/10/20



Maher S. Ahmed
On behalf of Protestant

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SECRETARY/BUREAU

'st Taxi LLC
304 Walnut St.
36 PA 17103



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