

Docket No. A-2020-3023024
Packhorse Moving LLC
Data Request

In your previous reply to a data request, you said Packhorse Moving LLC had hired a professional mover that had more than two-years' experience working with a licensed household goods carrier. That individual is a man by the name of Salem Baker, and he would be employed as Crew Leader. You said that his work experience was for Agile Delivery (Amazon) in 2018, Reno Logistics (FedEx Ground) in 2019, and Fifth Gear Enterprises (FedEx Ground) in 2020. However, in order to meet the Commission's experience requirements, either you (the applicant) has to have two-years' experience working for a licensed household goods carrier, or at the bare minimum you've hired a General Manager to run all operations. Hiring a Crew Leader with two-years' experience working for a licensed household goods carrier does not meet this threshold. Nor does it appear that Mr. Baker has any experience, from the information provided, working for a **licensed household goods carrier**. Please provide evidence that Packhorse Moving LLC can meet the Commission's requirement for experience as required by 52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(-I-).

Thank you for your response to our petition to be a licensed household goods carrier. In the ruling above, could you advise if the companies provided (Amazon/FedEx Ground) are not valid licensed carriers? Or is the ruling because of the title assigned to Salem Baker was a Crew Leader versus a General Manager? Upon review of 52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(-I-) it is not stated specifically in those regards. We are willing to do whatever it takes to establish the proper authorities and be in complete compliance with the commission's current standards. Please let us know what we can do to make this valid.

Ryan Ferrier





COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

June 21, 2021

Docket No. A-2020-3023024

PACKHORSE MOVING LLC
542 CANTERBURY ROAD
JEFFERSONVILLE PA 19403

RE: Application of Packhorse Moving LLC, at Docket No. A-2020-3023024, for Motor Common Carrier of Household Goods in Use Service.

To Whom It May Concern:

On November 30, 2020, the application of **Packhorse Moving LLC** was accepted for filing and docketed with the Public Utility Commission. In order to complete the analysis of the application, the Bureau of Technical Utility Services requires additional information.

Please be advised that you are directed to forward the requested information to the Commission **within 10 days of receipt of this letter**. Failure to respond may result in the application being denied. As well, if **Packhorse Moving LLC** has decided to withdraw its application, please reply notifying the Commission of such a decision.

Please forward the information to the Secretary of the Commission at the address listed below. When submitting documents, all documents requiring notary stamps must have original signatures. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

Due to the pandemic emergency, the Commission has no access to mail delivery. ALL Parties to proceedings pending before the Commission must open an e-filing account through the Commission's website, use e-filing and accept e-service as required by the Commission's Emergency Order at Docket Number M-2020-3019262. If a filing contains confidential or proprietary material, the filing may be sent to Secretary Chiavetta at rchiavetta@pa.gov.

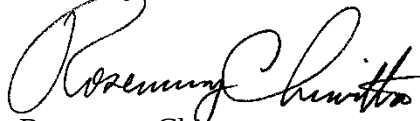
Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, ___Ryan Ferrier_____, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

Please direct any questions to David Canzoneri, Bureau of Technical Utility Services, at (717) 346-9738. Faxed or e-mailed filings are not accepted.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure

