

# PAGE, WOLFBERG & WIRTH LLC

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December 1, 2021

*VIA ELECTRONIC FILING*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building – 2<sup>nd</sup> Floor  
400 North St.  
Harrisburg, PA 17120

**Re: Request for Discontinuance and Cancellation of Duplicative Rights  
Presently Held by Constable Transport Service, LLC  
at Docket No. A-2019-3008136**

Dear Secretary's Bureau:

This firm represents Constable Transport Service, LLC, which is applying for amended paratransit authority at Docket No. A-2021-3028473. It is our understanding (based on the November 10, 2021 application approval letter from the Commission) that the amended authority at Docket No. A-2021-3028473 can only be issued if Constable Transport Service, LLC files "An application for the discontinuance and cancellation of the duplicative rights presently held by the applicant at A-2019-3008136." For this reason alone and contingent upon the Commission's issuance of the Certificate of Public Convenience at Docket No. A-2021-3028473 in such a manner that Constable Transport Service, LLC does not have a lapse in or absence of paratransit authority, files the attached "Application for Approval of Abandonment or Discontinuance of Service, In Whole Or In Part," for Constable Transport Service, LLC's authority at Docket No. A-2019-3008136, which is what we understand needs to be filed to comply with number c of the Commission's November 10, 2021 approval letter. Constable Transport Service, LLC's Carrier ID is A-6419196.

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If the Commission believes anything additional is required before it can issue the new Certificate of Public Convenience at Docket No. A-2021-3028473, please let me know at your earliest convenience. Thank you for your prompt attention to this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Christina M. Mellott". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Christina M. Mellott

CMM:ms  
Enclosure

cc: Joshua Kwiatskowski (*via email*)  
Constable Transport Service, LLC (*via email*)

**APPLICATION FOR APPROVAL OF ABANDONMENT OR  
DISCONTINUANCE OF SERVICE, IN WHOLE OR IN PART**

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

(See Instructions Before Preparing Application)

**In re:**

Application Docket

No. A-2019-3008136

Folder No. \_\_\_\_\_

For approval of the abandonment or  
discontinuance of common carrier service.

TO PENNSYLVANIA PUBLIC UTILITY COMMISSION:

1. Constable Transport Service, LLC  
(Name of applicant, and trade name, as it appears on the Certificate  
of Public Convenience.)  
4340 Winfield Terrace  
(Business Street Address)  
Bethlehem, PA 18045 Northampton  
(City) (State) (Zip) (County)  
(484) 239-2660 constabletransportservice@gmail.com  
(Telephone) (E-mail Address)
2. **Applicant's attorney (for this application) is:**  
Christina M. Mellott, Esq. 5010 E. Trindle Rd. Ste. 202 (717) 691-0100  
Page, Wolfberg & Wirth, LLC Mechanicsburg, PA 17050 cmellott@pwwemslaw.com  
(Name) (Address) (Telephone/ Email)
3. **Any notice, process or order of the PUC should be served upon:**  
Christina M. Mellott, Esq. cmellott@pwwemslaw.com  
Page, Wolfberg & Wirth, LLC  
(Name) (Email Address) The Commission will only serve  
documents via e-serve or e-mail during the COVID 19 crisis.

4. This application is for the discontinuance of part  
of the service now authorized. (All or Part)

5. Approval of the application is necessary or proper for the following reasons:

The November 8, 2021 correspondence from the Commission at Docket No. A-2021-3028473 indicated that in order for the authority at Docket No. A-2021-3028473 to be issued, the Applicant (Constable Transport Service, LLC) had to file an "application for the discontinuance and cancellation of the duplicative rights presently held by the applicant at A-2018-3001369." However, the Applicant has a certificate from the Commission dated June 6, 2019 abandoning the authority held at A-2018-3001369, which the Commission indicated was required before the authority the Applicant presently holds at A-2019-3008136 would be issued. Therefore, we assume that the November 8, 2021 correspondence from the Commission referenced the incorrect docket number, and that the authority the Applicant holds at A-2019-3008136 is actually what the Commission requires the Applicant relinquish before the rights at A-2021-3028473 will be issued. This Application for Discontinuance and Cancellation of the Applicant's authority at Docket No. A-2019-3008136 is contingent upon the Commission's issuance of the Certificate of Public Convenience at Docket No. A-2021-3028473 in a manner such that Constable Transport Service, LLC does not have a lapse in or absence of paratransit authority.

Wherefore, Applicant requests the Commission to cancel, or amend the certificate of public convenience, as now held, in conformance with the application.

Applicant sign here:   
\_\_\_\_\_

(If a partnership, each partner must sign; if a corporation, at least one officer must sign.)

**VERIFICATION**

Shawn Fariello  
\_\_\_\_\_ hereby states that the statements made in the  
(Name of Person)  
foregoing are true and correct to the best of his/her knowledge, information and  
belief. The undersigned understands that the estimates therein are made subject  
to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to  
authorities.

  
\_\_\_\_\_  
Signature of Person

Date: 11/23/2021