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March 30, 2022

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Application of Tass Trans, LLC;
Docket No. A-2021-3030150

Dear Secretary Chiavetta:

Enclosed for filing please find the Restrictive Amendment between the Applicant, Tass Trans, LLC and Joint Protestants, Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc., and Tri County Transit Service, Inc. in the above-captioned proceeding.

Copies are being served in accordance with the attached Certificate of Service. Please contact me with any questions or concerns.

Respectfully submitted,



Tanya C. Leshko

TCL/tlg
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Tass Trans LLC for authority :
to transport, as a common carrier, by motor :
vehicle, persons in paratransit service, from : Docket No. A-2021-3030150
points in the Counties of Bucks and :
Montgomery and the City and County of :
Philadelphia to points in Pennsylvania, and :
return. :

RESTRICTIVE AMENDMENT AND STIPULATION

AND NOW, come Applicant Tass Trans LLC (“Applicant”), and Joint Protestants Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc. and Tri County Transit Service, Inc. (“Joint Protestants”), by and through their respective attorneys, and file this Restrictive Amendment and Stipulation in the above-captioned matter as follows:

1. The above-captioned Application is hereby amended to clearly identify and specify the territory requested so that the authority sought shall read as follows:

To transport, as a common carrier, persons in paratransit service from points in Philadelphia County to points in Pennsylvania and return.

2. Based upon the Restrictive Amendment set forth in Paragraph 1 above, and conditioned upon its acceptance and approval by the Pennsylvania Public Utility Commission (“Commission”) and any order issued being consistent therewith, Joint Protestants agree to withdraw their respective Protests to the Application as amended, subject to the following two conditions and requirements: (i) in the event that any aspect of this Restrictive Amendment and Stipulation is rejected by the Commission for any reason, the Protests shall be deemed immediately reinstated, this proceeding shall be scheduled for hearing to permit Joint Protestants

to present evidence in an on-the-record proceeding in opposition to approval of the Application, and neither the Restrictive Amendment, nor the fact that the parties agreed to submit it to the Commission, shall be used against any party in any subsequent hearing or proceeding; and (ii) in the event that any aspect of this Restrictive Amendment and Stipulation is rejected by the Commission for any reason, the Joint Protestants shall have the right to request reconsideration before the Commission or to appeal before any and all appropriate courts, or both, and in any such proceedings Applicant shall not raise any objections as to party status or standing of the Joint Protestants.

3. The Restrictive Amendment set forth in Paragraph 1 is in the public interest because it will allow the Applicant to provide paratransit service in a manner consistent with its operating objectives, and it will resolve the Protests to the Application while avoiding the time and expense of further litigation.

4. Joint Protestants desire to remain a party of record so as to receive copies of any orders or other documentation issued by the Commission in the proceeding.

WHEREFORE, the parties, in consideration of the promises mutually set forth above and intending to be legally bound, have executed this Restrictive Amendment as of this 30th day of March, 2022.

TASS TRANS, LLC

**BUCKS COUNTY TRANSPORT, INC.,
BUX-MONT TRANSPORTATION, INC.,
EASTON COACH COMPANY,
SUBURBAN TRANSIT NETWORK, INC.
AND TRI COUNTY TRANSIT SERVICE, INC.**

By 

Mark Feinman, Esquire
LAW OFFICES OF MARK FEINMAN
8171 Castor Ave
Philadelphia, PA 19152

*Attorney for Applicant
Abdelmoniem Taka, CEO
Omer Adam, CFO
6453 Eastwood Street
Philadelphia, PA 19149*

By _____

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*Attorney for Joint Protestants
Bucks County Transport, Inc., Bux-Mont
Transportation, Inc., Easton Coach Company,
Suburban Transit Network, Inc. and Tri
County Transit Service, Inc.*

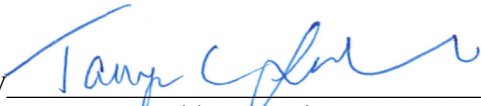
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Harrisburg, PA 17101

*Attorney for Joint Protestants
Bucks County Transport, Inc., Bux-Mont
Transportation, Inc., Easton Coach Company,
Suburban Transit Network, Inc. and Tri
County Transit Service, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of March, 2022, served a true and correct copy of the foregoing Restrictive Amendment upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

Via Electronic Mail:

Hon. Darlene D. Heep
Administrative Law Judge
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
dheep@pa.gov

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Tanya C. Leshko, Esquire