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July 29, 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 Special Delivery Mobility LLC;
Docket No. A-2022-3033009

Dear Secretary Chiavetta:

Enclosed for filing please find the Restrictive Amendment between the Applicant, Special Delivery Mobility LLC and Joint Protestants, Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc., Tri County Transit Service, Inc. and Rover Community Transportation, 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 Special Delivery Mobility :
LLC for authority to transport, as a common :
carrier, by motor vehicle, in nonambulance, : Docket No. A-2022-3033009
nonemergency and nonmedical paratransit :
service in a stretcher van, from points in the :
Counties of Bucks, Chester, Delaware and :
Montgomery and the City and County of :
Philadelphia, to points in Pennsylvania, and :
return. :

RESTRICTIVE AMENDMENT AND STIPULATION

AND NOW, come Applicant Special Delivery Mobility LLC (“Applicant”), and Joint Protestants Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc., Tri County Transit Service, Inc. and Rover Community Transportation, 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 non-ambulatory persons, solely on secured stretchers, as a common carrier, by motor vehicle, in nonambulance, nonemergency and nonmedical paratransit service in a stretcher van, from points in the Counties of Bucks, Chester, Delaware and Montgomery, and the City and County of Philadelphia, 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.

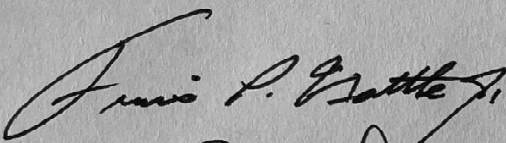
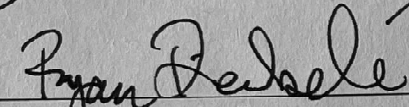
3. The Restrictive Amendment set forth in Paragraph 1 is in the public interest because it will allow the Applicant to provide paratransit service in a manner consistent with its operating objectives, and it will resolve the Protests to the Application while avoiding the time and expense of further litigation.

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 29 day of July, 2022.

SPECIAL DELIVERY MOBILITY LLC

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


By 
Francis Nattle Jr.
Ryan Deibele
Special Delivery Mobility LLC
249 Bridge Street
Phoenixville, PA 19460

By _____
Tanya C. Leshko, Esquire
BUCHANAN INGERSOLL & ROONEY
409 North Second Street, Suite 500
Harrisburg, PA 17101

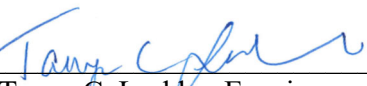
*Attorney for Joint Protestants
Bucks County Transport, Inc., Bux-Mont
Transportation, Inc., Easton Coach Company,
Suburban Transit Network, Inc., Tri County
Transit Service, Inc. and Rover Community
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Special Delivery Mobility LLC
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By  _____
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*Attorney for Joint Protestants
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return. :

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing document upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email:

Francis Nattle Jr.
Ryan Deibele
Special Delivery Mobility LLC
249 Bridge Street
Phoenixville, PA 19460
frank@specialdeliverymobility.com

Date: July 29, 2022



Tanya C. Leshko