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October 10, 2022

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utilities Commission
400 North Street
Harrisburg, PA 17120
Via Electronic Filing

RE: Application of Northeastern Movers, Inc., A-8922088; A-2022-3035356

Dear Secretary Chiavetta:

The purpose of this letter is to respond to your request for information regarding the above application.

1. You requested clarification regarding Northeastern's current operations. Northeastern presently holds operating authority for intrastate moves in New York, from the New York Department of Transportation and for interstate moves from the FMCSA. Northeastern currently engages only in operations that are consistent with this authority. Its work in Pennsylvania is therefore limited to interstate moves into or out of Pennsylvania. Northeastern is not and will not operate intrastate moves within Pennsylvania unless and until it is granted authority to do so.

Until recently, Northeastern's website described operations in Pennsylvania. Northeastern had directed its website provider to set this up based on its Pennsylvania interstate operations using the template for the portion of its website describing its New York operations. While the Pennsylvania portion of the website did not explicitly state that it was performing intrastate work in Pennsylvania, it did not specifically clarify that it was not performing such moves either.¹ In response to concern raised by the Commission, this portion of the website has been removed pending Northeastern being awarded intrastate authority in Pennsylvania. This was partially the result of a miscommunication between Mr. McKeon and his website provider. Mr. McKeon understands that he is responsible for the content of his website regardless and that he needs to more carefully review changes to the website in the future.

2. Applicant amends Paragraph 4 of its verified statement as follows: Applicant intends to maintain the records required by the PUC in locked file cabinets at its office and, where digital, on secure cloud-

¹ The Commission's letter refers to the website's advertisement of "local moving service." The use of the word "local" was not intended to imply intrastate, especially given the Scranton area's close proximity to other states, allowing Northeastern to service customers moving short distances across state lines.

based servers. Applicant will maintain continuous contact with its drivers via mobile phone and communicate scheduling to drivers and crew members via phone and email. Applicant has a 2000 square foot office space to run its business operations and a 28,838 square foot warehouse for storage with parking adequate for its trucks and equipment.

3. Applicant amends Paragraph 6 of its verified statement to include VIN numbers as follows:

| Year | Make | Model | Seating Capacity | VIN | Approximate Mileage |
|------|---------------|-------|------------------|-------------------|---------------------|
| 1997 | International | 4700 | 3 | 1HTSMABM8VH464362 | 200,000 |
| 2017 | Freightliner | M2106 | 3 | 3ALACWDT9HDJG0481 | 100,000 |
| 2017 | Ford | 250 | 3 | 1FTYR2CM8HKA59381 | 50,000 |
| 2017 | Mitsubishi | Fuso | 3 | JL6CRK1A0HK002926 | 20,000 |
| 2018 | Ford | E450 | 3 | 1FDXE4FS6JDC14321 | 50,000 |
| 2018 | Hino | 280 | 3 | 5PVNJ8JVXJ4S68916 | 100,000 |
| 2017 | Isuzu | NPR | 3 | JALE5W161H7300421 | 125,000 |
| 2018 | Hino | 280 | 3 | 5PVNJ8JV7J4S70185 | 100,000 |
| 1999 | International | 4700 | 3 | 1HTSCAAM9XH620092 | 200,000 |
| 2020 | International | MV607 | 3 | 3HAEUMML1LL899704 | 45,000 |

4. Applicant updates its statement of financial interests, attached. It appears that the discrepancy described in the data request letter was caused by the fact that the original statement omitted the funds in Applicant's investment account.

Please contact me if you need any further information to process Applicant's application. Applicant also intends to submit an application to begin service as a motor common carrier of property.

Sincerely,

Andrew J. Horowitz, Esquire

VERIFICATION

I, Edward T. McKeon, 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).

Signature: Ed McKeon

Date: 10/10/2022

Ms. Rosemary Chivetta
Secretary
Pennsylvania Public Utilities Commission
625 North Street
Harrisburg, PA 17129
Via Electronic Filing

Re: Application of Northeastern Motors, Inc., A-917319, A-917320, A-917321

Dear Secretary Chivetta:

The purpose of this letter is to respond to your request for information regarding the above application.

You requested clarification regarding the information provided in the application regarding the interstate work of New York, from the New York Department of Transportation and the various permits from the NYCTA. Northeastern currently operates in Pennsylvania in compliance with the authority. As you are fully aware, the authority is currently in the process of reviewing the application. Northeastern is not and will not operate interstate services within Pennsylvania unless and until it is granted authority to do so.

On the other hand, Northeastern's website described operations in Pennsylvania. Northeastern had directed its website provider to set this up based on its Pennsylvania interstate operations using the template for the content of its website describing its New York operations. While the Pennsylvania portion of the website did not explicitly state that it was performing such interstate work in Pennsylvania, it did not specifically clarify that it was not performing such interstate work. In response to concerns raised by the Commission, the portion of the website has been removed pending Northeastern being granted interstate authority in Pennsylvania. The website is the result of a misunderstanding by the website provider, Mr. Ed McKeon, who states that he is responsible for the content of the website and that he needs to review carefully any changes to the website in the future.

Appendix B consists of the verified statement as follows: Appendix B consists of the verified statement required by the PUC in locked file format at the end of this letter, which is attached to this letter.

The Commission's filing of this letter is not an admission of "total non-compliance." The purpose of this letter is to provide information to the Commission, especially given the Commission's role in providing a fair and equitable rate of return to service providers. Having this information available to the Commission is in the public interest.