

PETITION FOR RECONSIDERATION FROM STAFF ACTION

Tribe Moving LLC
2482 Hay Creek Road
Birdsboro, PA 19508

DATE OF DEPOSIT

MAR 28 2023

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BY: Overnight Mail

March 27, 2023

Secretary
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

Dear Commissioners,

- 1.) Applicant is Tribe Moving LLC, a limited liability company organized and existing under laws of the Commonwealth of Pennsylvania ("Applicant"). Applicant hereby petitions for Reconsideration from Staff Action following the denial of Applicant's application for Household Goods in Use. The Commission's denial was based on Applicants failure to establish to the satisfaction of the Commission that it had, through its officers and or employees, at least two-years' experience with a licensed households good carrier or the equivalent, as required by 52 Pa. Code § 3.381(c) (1)(iii)(A)(II)(-1-).
- 2.) The case docket number is A-8925989; A-2023-3038475;
- 3.) Carrie L. Mountz files this petition on behalf of Applicant in her capacity as owner and Vice-President. Carrie's husband Mark is President of the business.
- 4.) Applicant is wholly-owned by Mark and Carrie Mountz, husband and wife, residing at 2482 Hay Creek Road, Birdsboro PA 19508. Mark has co-owned/operated Mountz Disposal Service Incorporated for 25 years. Mountz Disposal has over 5,000 residential customers and approximately 1,000 commercial accounts located in Pennsylvania. Mountz Disposal provides to such residential customers trash, recycling, bulk item, and donation services. This primarily involves the collection and transportation of household goods and other personal property that has been discarded by its residential customers. In doing so, Mountz Disposal has complied with all DOT and DEP regulations. When transporting, Mountz Disposal exercises

great care in keeping trash off Pennsylvania roadways and ensuring that sensitive information of its customers is not jeopardized. Mountz Disposal goes above and beyond to protect its customers and their personal property by conducting background checks on all employees and strictly adhering to an established Code of Conduct including random drug test screenings. Finally, as part of its business, Mountz Disposal is hired to clean out certain residential areas, whereby Mountz Disposal personnel is entrusted by residential customers to enter their homes or other properties to physically carry unwanted personal property to its trucks for subsequent disposal or donation. Applicants desire to proceed as a "moving company" stems from its owners lending Mountz Disposal personnel to provide the manpower needed to physically move/carry personal property from one room within a retirement communities to another. In short, Mark and Carrie, owners of the Applicant, have through their ownership and operation of Mountz Disposal, served Pennsylvania households by responsibly transporting their discarded personal property and providing other related residential services since 1998.

In addition, as part of its previous submission to the Commission attached hereto as Exhibit A. Applicant noted that certain of its key employees has considerable experience in the moving industry, including Kelly Keiser (Applicants Head Packer) who worked for two years for Fritz Moving Company, Inc in Reading, PA. While Applicant is unable to produce the specific evidence of Ms. Keiser's employment requested by the Commission (because Ms. Keiser worked for Fritz over 10 years ago and Fritz is no longer in business). Applicant respectfully requests that the Commission consider, based upon this attestation or other evidence deemed satisfactory to the Commission, that the prior work experience of such key employees is deemed at least secondary and contributing factor in the determination of whether the relevant work experience requirement 52 Pa. Code §3.381(c)(1)(iii)(A)(II)(-1-) has been satisfied.

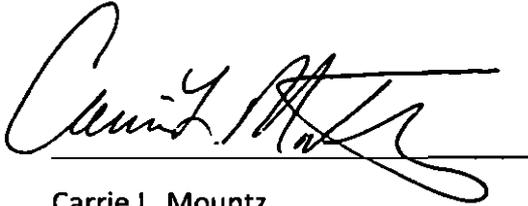
Applicant intends to hire additional employees with experience in the moving industry but has not done yet because of the challenging labor market and the fact that the Applicants business is only in its infancy. As customer demands grow, Applicant intends to continue its focus on expanding its existing roster of experienced movers as a top priority. Applicant has obtained their USDOT #4045361 and also required insurance. If requirements of 52 PA. Code §3.381(c)(1)(iii)(A)(II)(-1-) are met, Applicant will then submit tariff.

In conclusion, Applicant hereby respectfully requests that the Commission consider the totality of the above-described activity to satisfy the experience requirements of 52 Pa. Code §3.381(c)(1)(iii)(A)(II)(-1-).

- 5.) I, the undersigned, Carrie L. Mountz, hereby state that the facts above are set forth are true and correct (or are true and correct to the best of my knowledge, information, and belief) and that I expect 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).

Respectfully submitted on March 27, 2023, by:

A handwritten signature in black ink, appearing to read "Carrie L. Mountz", written over a horizontal line. The signature is cursive and stylized.

Carrie L. Mountz

Owner, Tribe Moving LLC

Exhibit A

1. Kelly Keiser will be our Head Packer. Her role will include working with the families to make sure they are satisfied with our services provided inside the homes. She will provide light packing of boxes and personal items for loading. She will make sure all items are secure, bubble wrapped, and taped for loading on the truck.

I spoke with Kelly Keiser who advised that she does not have her W-2s as her employment with Fritz Moving Company was over 10 years ago and they are no longer in operation. She advised that she only has records for the past 7-10 years and during that time she was a stay-at-home Mom.

2. Justin Steckbeck will be our Head Supervisor. His duties will include driving our truck, maintaining the truck, moving larger items, meeting with customers and assisting with writing estimates and preparing the customers for their moving day.

**Tribe Moving LLC will primarily work in retirement communities (Downsizing) transporting items from one building to another. There will internal moves as well as external moves to storage units, family homes, and auction houses.

DATE OF DEPOSIT

MAR 28 2023

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**



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17120

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Tribe Moving LLC
2482 Hay Creek Rd.
Birdsboro, PA 19508

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Secretary, PA Public Utility Commission
400 North Street
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MAR 29 2023

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PO ZIP Code 19508	Scheduled Delivery Date (MM/DD/YY) 3/29/23	Postage \$ 28.75	
Date Accepted (MM/DD/YY) 3/28/23	Scheduled Delivery Time 9:00 PM	Insurance Fee \$	COD Fee \$
Time Accepted 9:52 AM		Return Receipt Fee \$	Live Animal Transportation Fee \$
Special Handling/Fragile \$	Sunday/Holiday Premium Fee \$	Total Postage & Fees \$ 28.75	
Weight 0 lbs. 2 ozs.	Acceptance Employee Initials AE		

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PEEL FROM THIS CORNER