

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :
BUREAU OF INVESTIGATION AND ENFORCEMENT :

V. :

DOCKET NO. C-2023-3031380

SAFE TRANSPORTAION GROUP :
T/A PRIME ON TIME AND CORPORATE :
EXPRESS CAB :
1000 INTEGRITY DRIVE SUITE 350 :
PITTSBURGH, PENNSYLVANIA 15235 :

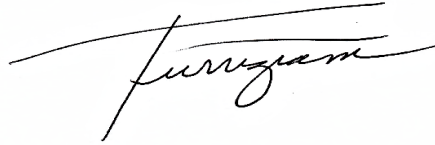
COMPLAINT

The Pennsylvania Public Utility Commission (Commission) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Investigation and Enforcement and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Investigation and Enforcement hereby represents as follows:

1. That SAFE TRANSPORTATION GROUP, T/A PRIME ON TIME AND CORPORATE EXPRESS CAB, Respondent, maintains a principal place of business at 1000 Integrity Drive, Suite 350, Pittsburgh, PA 15235.
2. On September 22, 2015, Respondent was issued a certificate of public convenience by this Commission authorizing transport, as a common carrier, by motor vehicle, persons in call or demand service, between points in the Counties of Allegheny, Armstrong, Butler, Fayette, Washington, and Westmoreland with exceptions noted on the certificate at PUC utility code no. 6417792.
3. Between October 5, 2022, through November 16, 2022 , PUC Enforcement Officer Christopher Urey attempted several times to contact Respondent by phone. On December 15, 2022, Officer Urey spoke with Kathleean Rubright, co-owner, regarding the 2022 Annual Taxi Inspection. Ms. Rubright stated that the carrier has not operated, at which time Officer Urey advised Mr. Rubright that an abandonment form must be completed as required by law. Officer Urey indicated that if there were any additional questions to contact him and relayed his state cell phone number. Respondent has not contacted the regional office, Officer Urey, nor filed the abandonment form.
4. That Respondent, by failing to file an application with this Commission prior to abandoning or discontinuing service, violated 52 Pa. Code §3.3819(a) and 66 Pa. C.S. §1102(a)(2). The penalty for this violation is cancellation of the certificate held by Respondent with this Commission at utility code 6417792.

WHEREFORE, the Bureau of Investigation and Enforcement hereby requests that the Commission revoke the certificate of public convenience issued to Safe Transportation Group, LLC, T/A Prime on Time and Corporate Express Cab at PUC utility code no. 6417792.

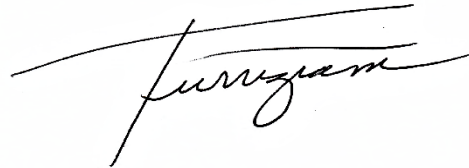
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Turriziani", with a long horizontal stroke extending to the left.

Andrew Turriziani, Chief
Motor Carrier Enforcement
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120

VERIFICATION

I, Andrew Turriziani, 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 that the Bureau will be able to prove same at any 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.

A handwritten signature in black ink, appearing to read "Turriziani", written in a cursive style.

Date: 9 September 2023

Andrew Turriziani, Chief
Motor Carrier Enforcement
Bureau of Investigation and Enforcement

NOTICE

- A. You must file an Answer within twenty (20) days of the date of service of this Complaint. The date of service is the mailing date as indicated at the top of the Secretarial Cover Letter for this Complaint and Notice, 52 Pa. Code §1.56(a). An Answer is a written explanation of circumstances wished to be considered in determining the outcome. The Answer shall raise all factual and legal arguments that you wish to claim in your defense and must include the reference number of this Complaint. Your Answer must be verified, and the original shall be mailed to:

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

Or you may **eFile your Answer** using the Commission's website at www.puc.pa.gov. The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy.

Additionally, a copy should either be mailed to:

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

Or, **e-mailed to:** RA-PCCmplntResp@pa.gov

- B. If you fail to answer this complaint within twenty (20) days, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a penalty. The penalty could include a fine, the suspension or revocation of your certificate of public convenience or other remedy.
- C. If you file an Answer, which admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a penalty.
- D. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The judge is not bound by the optional fine set forth above.
- E. Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.