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October 15, 2024

VIA E-FILING

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

Re: Application of First Line EMS LLC
Docket No: A-2024-3050588

Dear Secretary Chiavetta:

Enclosed for filing please find the Restrictive Amendment between the Applicant, First Line EMS 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/ja

Enclosure

cc: Certificate of Service
First Line EMS LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of First Line EMS LLC to :
Transport, as a Common Carrier, by Motor :
Vehicle, Persons in Paratransit Service, : Docket No. A-2024-3050588
between points in the Counties of Bucks, :
Chester, Delaware and Montgomery and the :
City and County of Philadelphia. :

RESTRICTIVE AMENDMENT

AND NOW, come Applicant First Line EMS 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 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:

For approval to begin operating as a common carrier for transportation of persons in paratransit service, among and between points in the Counties of Chester, Delaware, and the City and County of Philadelphia, and; from points in the Counties of Chester, Delaware, and the City and County of Philadelphia to points in the Counties of Bucks and Montgomery 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 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 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 15 day of October, 2024.

FIRST LINE EMS LLC

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

By Christopher P. Fiore
Christopher P. Fiore, Esquire
FIORE & BARBER LLC
1690 Sumneytown Pike – Suite 250
Lansdale, PA 19446

*Attorney for Applicant
Heart to Home Transportation LLC*

By Tanya C. Leshko
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. and
Tri County Transit Service, Inc.*

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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 and Regular Mail:

Christopher P. Fiore, Esquire
Fiore & Barber LLC
1690 Sumneytown Pike – Suite 250
Lansdale, PA 19446
cfiore@fiorebarber.com

Date: October 15, 2024



Tanya C. Leshko