



COMMONWEALTH OF PENNSYLVANIA

PENNSYLVANIA PUBLIC UTILITY COMMISSION

COMMONWEALTH KEYSTONE BUILDING

400 NORTH STREET

HARRISBURG, PENNSYLVANIA 17120

<http://www.puc.pa.gov>

December 3, 2024

Docket No. A-2024-3051783

**EUPHRATES TRANS LLC
6201 HAMILTON BLVD
SUITE 209
ALLENTOWN PA 18106**

RE: Application of Euphrates Trans, LLC, 6201 Hamilton Blvd., Suite 209, Allentown, Lehigh County, PA 18106. 973-204-9129

To Whom It May Concern:

On October 24, 2024, the applicant of EUPHRATES TRANS, LLC, was accepted by the Commission; however, multiple issues must be addressed before publication to the Pennsylvania Bulletin may proceed. Please review page three of this correspondence for additional information and respond appropriately.

Please forward the information to the Secretary of the Commission **within ten (10) working days** from the date of this letter. **Currently, the only acceptable means of filing your response is through the Commission's e-file system. Information is available at the following link to efile: <https://www.puc.state.pa.us/>**

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, _____, 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).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

Please submit your response to the address cited in this letter's header. Faxes, emails, and other forms of filing are unacceptable.

Sincerely,

A handwritten signature in black ink that reads 'Rosemary Chiavetta'. The signature is fluid and cursive.

Rosemary Chiavetta, Secretary

Enclosure

cc: Josh Kwiatkowski

Docket No. A-2024-3051783
EUPHRATES TRANS, LLC
Data Request

1. Please provide an explanation of your plan to offer safe, efficient, and reasonable service to areas as far separated as Lehigh and Allegheny counties with only 3 vehicles/drivers and one facility located in Allentown? As an applicant, you need to establish that you have suitable resources and finances to support each location. If you presently lack sufficient resources, you should revise your application's authority area to only the areas you can presently support. The Commission may deny authority for all or part of the requested territory if it believes you lack suitable fitness. Also bear in mind that you may apply for additional territory once you have additional resources to support expanded operations.
2. You are expected to provide a PLAN that satisfies the requirements of 52 Pa Code. You may not defer this responsibility to a third-party provider. As the applicant, YOU are responsible for ensuring that your plan is compliant. You may defer the actual checks to a third-party, but you must understand for yourself when and what must be checked. Please review the requirements of the following chapters of 52 Pa Code **and provide a revised compliant plan for drivers.**
 - § 29.503. Driver age
 - § 29.504. Driver history (schedule and record retention)
 - § 29.505. Criminal history (schedule and record retention)
3. Please provide valid vehicle information. Vehicle ID # refers to the vehicle's identification number (VIN).
4. What is your annual cost for commercial paratransit coverage?
5. Please review the below criteria and submit a revised compliant Statement of Financial Position:
 - a. The statement presented must be **DATED and comprised of information which is less than 6 months old.**
 - b. The submission **MUST be comprised of information which is accurate as of the date provided.**
 - c. **The information is to be exact and should not include estimates or approximations when accurate numbers are available.** Property and vehicle valuations may be approximations; however, if the valuation is higher than typical Kelly Blue Book (or similar) valuations, you should provide an explanation as to why (e.g. vehicle with an installed wheelchair lift, etc).

Bank accounts and loan balances should be exact amounts (rounded to the nearest dollar).

- d. **ALL** relevant **assets and debts** are to be included (**for example: vehicle loan balances/vehicle asset value, lease expenses, etc.**).
- e. **The information provided is also to be strictly limited to assets and debts HELD BY THE APPLICANT (EUPHRATES TRANS, LLC), and not the individual member(s). Any property and accounts listed MUST be registered or titled to the corporation. Bank accounts must be in the name of EUPHRATES TRANS, LLC. Vehicles must be registered to EUPHRATES TRANS, LLC. Property must be titled to EUPHRATES TRANS, LLC. If these items are not in the name of EUPHRATES TRANS, LLC, should NOT be included on the balance sheet.**

If you have not fully funded and equipped the business, now is the time to do so (before re-submitting your corrections). Applicants lacking suitable finances, resources, and equipment will be denied authority.

Finally, in order to fully assist the Commission in determining your financial fitness, please provide supporting documentation for the statement of financial position (balance sheet). Acceptable means of support include current copies of bank statements (account numbers may be redacted), and notarized/official statements of account balances/ownership provided by bank officers (with current contact information). Any and all claimed vehicles or land/buildings must also include proof of ownership/registration vehicle titles, vehicle registrations, property titles, purchase agreements, etc.

You are encouraged to enlist professional financial assistance if you experience difficulty in constructing your statement of financial position. Be advised that failing to provide an acceptable financial statement is sufficient grounds for the denial of your application.