



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120
<http://www.puc.pa.gov>

December 26, 2024

A-6427619
A-2024-3052677

MONEER IBRAHIM
107 WINCHESTER GDNS
CARLISLE PA 17013

RE: APPLICATION OF MONEER IBRAHIM

To Whom It May Concern:

On December 20, 2024, the application of Moneer Ibrahim, at A-2024-3052677, as a motor carrier was accepted for filing and docketed with the Public Utility Commission. For the Commission to proceed with the application, additional information is required.

Please forward the information to the Secretary of the Commission at the following address **within ten (10) working days** from the date of this letter.

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

ALL Parties to proceedings pending before the Commission are advised to open and use an e-filing account through the Commission's website, OR you may submit your filing by mail. If a filing contains confidential or proprietary material, the filing is required to be submitted by mail.

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

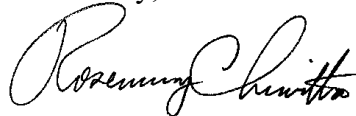
I, _____, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (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.

Failure to comply with this request within 10 working days from the date of this letter will result in the denial of the application.

Please direct any questions to Compliance Specialist Kevin Morgan, Bureau of Technical Utility Services at (717) 787-2687. Faxed or emailed filings are **not** accepted.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure

Docket No. A-2024-3052677
Moneer Ibrahim

Request for Information

- 1.) Under question #1 of the application, it is indicated that the applicant is a sole proprietor by listing the name of the applicant as Moneer Ibrahim despite the response to Question #5 of the application indicating this is a corporation or LLC. Please explain the discrepancy.

- 2.) Under question #4 of the application, you indicated the applicant “Moneer Ibrahim” is registered with the Department of State. An invalid PA Corporation Bureau entity id # was then provided. What is this number (#99 -0553301) and why was it submitted? Please clarify.

- 3.) The proposed persons being transported under question #10 of the application limits your service only to individuals who use wheelchairs or have health or mobility issues that prevent them from driving. Do you wish to broaden your customer base? If you do not wish to make changes, please make that statement, or verify that the below example is what you now intend.

Example: *To transport persons, by motor vehicle, in Paratransit service.*

This language would give your company the broadest customer base to work from.

- 4.) The proposed service area under question #10 of the application must be clear and must have defined borders. Unfortunately, using words like “nearby” is too vague and not allowed for a proper territory description. This may be achieved by using the Counties’ name(s).

Sample territories and services are provided on the last page of the data request. Please review them and keep the Commission’s criteria in mind when revising. Your proposed territory should be written in similar format, clearly and concisely. Please make corrections.

YOU SHOULD ONLY SPECIFY AREAS FROM WHICH YOU WISH TO ORIGINATE SERVICE.

Examples:

...between points in (County name/names here).

Means you CANNOT travel beyond the borders of the named counties.

... from points in (County name/names here), to points in Pennsylvania, and return.

Means you CAN travel beyond the county lines and return.

- 5.) Under question # 2 of the applicant's verified statements, is asking the applicant if there is affiliation with **ANY OTHER** carrier. If so, please list the name(s) and the description of the relation. Please do so now, as your previous answer was unacceptable.
- 6.) Under question # 4 of the applicant's verified statements mentioned you will be collaborating with brokers. Please provide a complete list of brokers you intend to contract with. List their names and indicate if contacts have been signed or letters of intent have been written.
- 7.) Under question #5 of the applicant's verified statements requires that you describe your hiring and employment policies in case of expansion. Provide compliant policies that satisfies the requirements of 52 Pa Code with revision to the specific chapters below. Please review Title 52 information online, which may be accessed at www.pacode.com.
- a.) § 29.503. Age restrictions. (minimum age): Will there be a minimum age requirement for drivers?
- b.) § 29.504. Driver's license checks. (schedule): How often will this be done?

c.) §29.505. Criminal history. (schedule): How often will this check be done?

8.) Question #7 of the applicant's verified statements.

As part of your periodic vehicle maintenance plan, will there be any pre and/or post trip inspections, and if so, what would that entail?

9.) The Statement of Financial Position (balance sheet).

At this point it is expected that the operation is fully funded. To fully assist the Commission in determining your financial fitness, please provide supporting documentation for the statement of financial position.

- a.) Provide current copies in the name of the applicant of bank statements (account numbers may be redacted), or a notarized/official statement(s) of account balances by bank officers with current contact information.
- b.) Provide proof of ownership/registration in the name of the applicant, for the claimed vehicle.

Note: Should this proof not submitted with your answers, this application must be denied and dismissed. It is the responsibility of the applicant seeking motor common carrier authority to demonstrate that it possesses the financial ability to provide the proposed service. *If you are unsure of how to properly prepare the required balance sheet, then you should consult with an accounting professional.

PASSENGER CARRIER TERRITORY EXAMPLES AND EXPLANATIONS:

The Public Utility Commission is specifically concerned with the location in which trips by your company will ORIGINATE. Your requested territory must have boundaries and is typically requested by County / Counties.

Take care in choosing the correct language. You must file a new application and pay an additional fee to amend any approved territory.

Examples below:

1) To transport persons, by motor vehicle, in Paratransit service, from points in (County name/names here), to points in Pennsylvania, and return.

This territory means that you are not limited on a vehicle type, not limited to the type of activity regarding non-emergency medical transportation, or transportation for virtually any reason. This language would give your company the broadest customer base to work from.

2) To transport persons, by motor vehicles, in Paratransit service, in wheelchair vans, between points in (County name/names here).

This territory means that you must:

- a) provide all services in wheelchair vans, and
- b) could travel only between points within the county or counties requested as your territory. You could not leave those counties and return.

3) To transport persons, by motor vehicle, in Paratransit service, limited to persons whose personal convictions prevent them from owning or operating motor vehicles, from points in (County name/names here), to points in Pennsylvania, and return.

This language is strictly for companies that specialize in transporting Amish people, this is NOT to be used for persons who are elderly and cannot drive, or who do not have a vehicle for any other reason.

Please contact the Tariff department for further explanations or guidance: (717) 214-7155) Please leave a message for a Call Back.