



COMMONWEALTH OF PENNSYLVANIA

PENNSYLVANIA PUBLIC UTILITY COMMISSION

COMMONWEALTH KEYSTONE BUILDING

400 NORTH STREET

HARRISBURG, PENNSYLVANIA 17120

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

February 13, 2025

Docket No. A-2025-3053144

**KUHNS MOVING SERVICE LLC
113 SPRING HOLLOW DR
APOLLO PA 15613**

**Re: Application of KUHN'S MOVING SERVICE, LLC, 113 Spring Hollow Dr., Apollo,
Westmoreland County, PA 15613. 724-994-6100**

To Whom It May Concern:

On January 30, 2025, the application of KUHN'S MOVING SERVICE, 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 on how to efile is available at the following link: <https://www.puc.pa.gov/>**

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'.

Rosemary Chiavetta, Secretary

Enclosure

cc: Josh Kwiatkowski

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KUHNS MOVING SERVICE, LLC
Data Request

1. Question #5 of the applicant's verified statements requires that you describe your hiring and employment policies. You are expected to provide a PLAN that satisfies the requirements of 52 Pa Code. Please review the requirements of the following chapters of 52 Pa Code and provide a revised compliant plan for drivers which specifically addresses these issues.
 - 52 Pa Code § 37.204, 49 CFR 391.11 - Age restrictions (minimum age).
 - 52 Pa Code § 37.204, 49 CFR 391.25 - Driver history. (schedule and storage of records)
 - 52 Pa Code § 31.134 - Criminal history. (schedule and storage of records)

2. Because you intend to commence operations with rented vehicles you will have less oversight of what actual maintenance is performed on the vehicles prior to your utilization of them in service. Please provide a detailed explanation of your pre-trip inspection criteria and include any pre-service vehicle check lists you might utilize to verify condition prior to placing the vehicle in service. Will you maintain copies of these inspections and will they include information which would make the vehicle identifiable in the event of an accident or compliance issue?

The purpose of the verified statement questions is to determine your ability to provide safe, efficient, and reasonable transportation. It is in your best interest to provide accurate, complete, and timely responses. Failure to do so is sufficient grounds to justify the denial of your application because YOU have failed to provide sufficient evidence of your fitness to operate. Be advised that additional corrections may not always be requested; therefore, prior to submitting your responses, your consultation with an attorney or financial expert familiar with Commission regulated Motor Carrier related proceedings is highly encouraged.