



COMMONWEALTH OF PENNSYLVANIA

PENNSYLVANIA PUBLIC UTILITY COMMISSION

COMMONWEALTH KEYSTONE BUILDING

400 NORTH STREET

HARRISBURG, PENNSYLVANIA 17120

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

April 3, 2025

Docket No. A-2025-3054280

**GREATER WORK TRANSIT SERVICES LLC
6715 RISING SUN AVE
PHILADELPHIA PA 19111**

**RE: Application of GREATER WORK TRANSIT SERVICES, LLC, 6715 RISING SUN AVE.,
Philadelphia, PA 19111. 215-397-7050**

To Whom It May Concern:

On March 28, 2025, the applicant of GREATER WORK TRANSIT SERVICES, 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-2025-3054280
GREATER WORK TRANSIT SERVICES, LLC
Data Request

1. The pages you have attached in support of your application make numerous references and statements that appear to demonstrate that the pages were generated by a third party which has not been referenced or acknowledged in response to Questions #1 and #2 of the verified statements. Please provide proper disclosure on who these pages were furnished by, and what their relationship is with the applicant.
2. Your proposed service area must be fully bound, and easily discernible. This may be achieved by the use of municipal boundaries, roads, railroads, or natural boundaries such as rivers and streams, etc. Vague terms such as, “in and around Philadelphia” are unacceptable and insufficiently specific.

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

Example:

- a. between points in the counties of X, Y, and Z.
 - b. from points in the counties of X, Y, and Z, to points in Pennsylvania.
 - c. from points in the counties of X, Y, and Z, to points in the counties of A, B, and C, and return
3. Your responses to Questions #3, 4, 5, 6, 7, and 8 of the Verified Statements are either missing, filled with superfluous content, or incomplete. You are expected to provide complete answers to each question, and each sub-part of each question. Responses such as, “AVAILABLE UPON REQUEST” are unacceptable as the verified statement form IS the request. No question should be considered optional.

When asked to provide a description you are expected to provide a DESCRIPTION which is fully responsive to each portion of the question.

When asked to provide a plan you are expected to provide a PLAN which is fully responsive to each portion of the question *and* to ensure that the plan satisfies the requirements of 52 Pa Code.

- a. In reference to Question #5, you are specifically advised to review the requirements of the following chapters of 52 Pa Code **and to submit EVIDENCE of compliant plan for drivers which completely addresses the following:**

- § 29.503. Driver age
 - § 29.504. Driver history (schedule and record retention)
 - § 29.505. Criminal history (schedule and record retention)
- b. Question #6 is not optional and contains multiple parts; each of which is essential to determine your fitness to operate.
 - c. In response to Question #7 of the Verified Statements - answer the question in full and explain how your plan complies with 67 Pa. Code, Chapter 175. For example, what is your vehicle inspection criteria to place a vehicle out of service and what, if any, pre and post trip inspections will you conduct? Can you provide written evidence of these policies? IS there a checklist for drivers, etc.?
 - d. What is your projected annual cost for commercial paratransit coverage and which company is your coverage provider? Have you verified that your policy will support the filing of the required Form E with the Commission?
4. 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 (GREATER WORK TRANSIT SERVICES, 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 GREATER WORK TRANSIT SERVICES, LLC. Vehicles must be registered to GREATER WORK TRANSIT SERVICES, LLC. Property must be titled to GREATER WORK TRANSIT SERVICES, LLC. If these items are not in the name**

of GREATER WORK TRANSIT SERVICES, 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 verifying 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 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.