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April 9, 2025

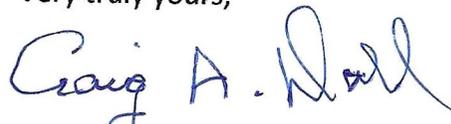
Re: **Application of POCONO MOUNTAIN TRANSPORTATION, INC., 399 Oak Street.,
East Stroudsburg, Monroe County, PA 18301
A-2025-3053910
Petition for Reconsideration**

To Whom It May Concern:

Attached please find the Petition for Reconsideration of Pocono Mountain Transportation, Inc. to the Commission Letter/Order of April 3, 2025, which was filed this date.

If you have any questions, please contact the undersigned.

Very truly yours,



Craig A. Doll

cc: Pocono Mountain Transportation, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of POCONO MOUNTAIN :
TRANSPORTATION, INC., : A-2025-3053910**

**PETITION FOR RECONSIDERATION OF
POCONO MOUNTAIN TRANSPORTATION, INC.**

NOW COMES, Pocono Mountain Transportation, Inc., by and through its undersigned counsel, filed this Petition for Reconsideration from the Commission's Secretarial Letter of April 3, 2025, pursuant to Section 703(g) of the Public Utility Code, 66 Pa. C.S. §703(g), and the Commission's regulations at 52 Pa. Code §§5.44 and 1.31. In support of reconsideration, Pocono Mountain Transportation, Inc. ("Pocono Mountain" or "Petitioner"), states as follows:

1. On March 12, 2025, Pocono Mountain filed an application seeking to provide Paratransit service in addition to its existing call and demand rights.
2. By secretarial letter dated March 17, 2025, the Commission issued a letter requesting additional data from Pocono Mountain, stating that "multiple issues must be addressed before publication to the Pennsylvania Bulletin may proceed." Within its Data Request, the Commission's data requests involved the content of Pocono Mountain's balance sheet and income statement.
3. On April 1, 2025, the undersigned efiled Pocono Mountain's Response to the Data Request (eFiling Confirmation Number 2726909).
4. By secretarial letter dated April 3, 2025, the Commission informed the undersigned that Pocono Mountain's Application has been denied for the "failure to establish fitness to operate."
5. "Fitness" consists of a two-pronged test – technical and financial. Within the four corners of its letter, no mention is made of Pocono Mountain's technical fitness. It appears that the only basis for the denial of the application is found in the following paragraph:

The supplied response included revised figures which differed from the original February 27, 2025, dated statement. The submission also lacked any manner or evidence to support the claimed assets and finances.

6. Pocono Mountain admits that the balance sheet and "proposed" balance sheet submitted in response to Staff's data request and the original filing were different. Pocono Mountain admits that the two submissions contained different figures

7. In its data request, Staff encouraged Pocono Mountain "...to enlist professional financial assistance" in constructing its financial statements.

8. Pocono Mountain, heeding the encouraging of Staff, requested that its accountant prepare updated financial statements of its behalf. The response to the data request was that prepared from the books and records of the company and not that of the individual owner.

9. Additionally, Staff's data request stated that the information provided "is to be exact and should not include estimates".

10. As Pocono Mountain is not currently providing the service requested in the application, any revenues and expenses can only be estimates of revenues and expenses.

11. In all other respects, Pocono Mountain has complied with the Staff's Data Request. If Staff desires additional information, it is free to issue another data request rather than summarily dismiss the Application.

WHEREFORE: Pocono Mountain Transportation respectfully requests that the Commission reconsider its Secretarial Letter of April 3, 2025, and grant the above captioned Application.

Respectfully Submitted,



Craig A. Doll, Esquire

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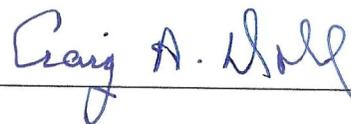
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ATTORNEY'S VERIFIATION

I, Craig A, Doll, Esquire, Attorney for Pocono Mountain Transportation, Inc. hereby verify that I have become acquainted with the facts and information set forth in the foregoing document; that the sme are true to the best of my knowledge, information, and belief; and that the foregoing verification is made subject to the penalties of 18 Pa. S.C. §4904.

A handwritten signature in blue ink that reads "Craig A. Doll". The signature is written in a cursive style and is positioned above a horizontal line.

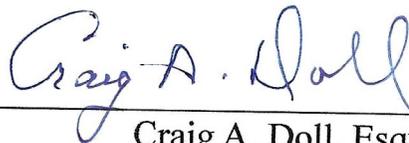
Craig A. Doll, Esquire

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing Petition for Reconsideration of Pocono Mountain Transportation, Inc. upon the persons and in the manner listed below in accordance with the Commission's regulations.

Efiling

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA. 17105-3265



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