

Docket No. A-2025-3054689
CLH Transportation Services LLC

Request for Information

1.) Question number 10 of the application asks to describe the service area proposed. Applicants providing service between points in the city and county of Philadelphia or from any airport, railroad station or hotel located in whole or in part in Philadelphia, must apply to the Philadelphia Parking Authority.

a. Do you intend to transport people in Limousine service throughout the entire state of Pennsylvania?

b. Do you intend to transport people in Limousine service in the city of Philadelphia and the county of Philadelphia?

2.) Under question #5 of the Verified Statement, please refer to PA code Title 52, §29.504 and §29.505 regarding driver's history and criminal history, driver's license checks and drug and alcohol testing. Read the regulations and provide a copy of your written policies to meet these requirements.

See attachments.

3.) You are required to provide a **DATED (at the top of the page)** Statement of Financial Position/ Balance Sheet which is comprised of information less than 6 months old. **If the company (CLH Transportation Services, LLC) has not yet been funded, then now is the time.** Please provide a current bank statement for CLH Transportation Services, LLC.

See attachments.

Failure to provide answers to all of the questions is sufficient grounds for the denial of your application so please get assistance or you may hire an attorney to aid you in the application process.

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

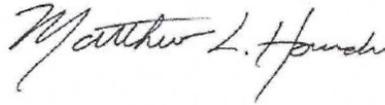
I, Collis Henerding, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 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 April Stover, Bureau of Technical Utility Services at 717-783-5945. Faxed or emailed filings are **not** accepted.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure

CLH Transportation Services LLC Policy

Driver Qualification, Background Screening, and Drug & Alcohol Testing Policy

(Adopted: May 1, 2025)

1 Purpose

CLH Transportation Services LLC ("CLH" or "the Company") is committed to providing safe, reliable, and lawful passenger-carrying limousine service in the Commonwealth of Pennsylvania. This written policy establishes uniform procedures for:

- verifying driver eligibility;
- conducting driver-history and criminal-background checks;
- monitoring driver licensing status; and
- preventing alcohol and controlled-substance use while operating vehicles.

The policy is designed to comply with **52 Pa. Code §§ 29.502 – 29.507**, related provisions of the Pennsylvania Public Utility Code, and applicable federal drug-testing regulations in **49 CFR Part 40 & Part 382**.

2 Scope

This policy applies to every individual who operates, or seeks to operate, a CLH vehicle in limousine service, whether as an employee or an independent contractor.

3 Regulatory References

Topic	Primary Regulation
Current driver's license	52 Pa. Code § 29.502
Age restrictions	52 Pa. Code § 29.503
Driver-history checks	52 Pa. Code § 29.504(b)
Criminal-history checks	52 Pa. Code § 29.505(b)
Alcohol prohibition	52 Pa. Code § 29.506
Controlled-substance prohibition	52 Pa. Code § 29.507
DOT drug & alcohol testing standards	49 CFR Part 40 / Part 382

4 Driver Eligibility Standards

- Minimum age – 21 years** (29.503).
- Valid license.** Each driver must hold an active, unrestricted Pennsylvania driver's license (or a valid license from another state, plus a PA reciprocal operating privilege). Commercial Driver's Licenses (CDLs) are required only when mandated by vehicle size or federal law. CLH verifies licensure annually and upon any renewal (29.502 & 29.504).
- Driving record**

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- *Disqualifying events at onboarding*: more than **three (3) moving violations** or **one (1) major violation** (e.g., reckless driving, leaving the scene, DUI) in the **preceding three (3) years** (29.504(b)(1)).
- *Ongoing standard*: drivers must continue to meet the above threshold; CLH will suspend or terminate any driver who exceeds it.

d. Criminal history.

- Disqualifying convictions include those listed in 29.505(b)(1)(i)–(iii), namely:
 - within 7 years – DUI of drugs/alcohol, felony theft, felony fraud, felony drug offenses;
 - within 10 years – using a motor vehicle to commit a felony, burglary, robbery;
 - **Lifetime** – sexual offenses, crimes of violence, or acts of terror.

e. **Medical qualification.** Drivers of vehicles seating 9–15 passengers must meet 49 CFR 391.41 physical standards (29.508).

f. **Drug & alcohol fitness.** Absolute **zero-tolerance** for operating a vehicle with any detectable alcohol (29.506) or controlled substance (29.507) in the body.

5 Screening & Monitoring Procedures

Check	Timing	Method	Record-Retention
Driver-history report	Pre-hire , then 1 year after onboarding , and every second year thereafter	PA Dept. of Transportation MVR, plus any other jurisdiction where the driver held a license	≥ 2 years from report date (29.504(b)(3))
Criminal-background check	Pre-hire , then 1 year after onboarding , and every second year thereafter	Multistate criminal locator w/ primary source validation + National Sex Offender Registry	≥ 3 years from report date (29.505(b)(3))
Driver-license status	Quarterly automated pull notice (PennDOT eGov)	Electronic verification	≥ 2 years
Drug & alcohol tests	See § 6	Chain-of-custody forms & MRO reports	≥ 5 years for positives/refusals; ≥ 1 year for negatives (49 CFR 40.333)

Drivers must self-report within **24 hours** any:

- license suspensions, revocations, or restrictions;
- arrests, citations, or convictions for disqualifying offenses; or
- positive, adulterated, or refused DOT drug/alcohol tests with any other employer.

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6 Drug & Alcohol Testing Program

CLH's program mirrors U.S. DOT rules (49 CFR Part 40/382) and applies to **all** drivers, even when a CDL is not required. Testing is conducted through a third-party Consortium/TPA using HHS-certified laboratories and breath-alcohol technicians.

Test Type	When Conducted
Pre-employment	After a conditional offer and before any passenger-carrying duty
Random	Throughout the year, annual selection rates meet or exceed FMCSA requirements (currently 50 % for drugs, 10 % for alcohol)
Post-accident	Following any crash involving (a) a fatality, or (b) a citation-issued collision with a tow-away or injury
Reasonable suspicion	Immediately, when a trained supervisor observes signs of impairment
Return-to-duty & Follow-up	After any positive test or refusal, per SAP evaluation

Refusals or *positive results* (≥ 0.04 BAC or lab-positive drug panel) result in immediate removal from service, required Substance Abuse Professional (SAP) evaluation, and only conditional reinstatement after successful completion of the DOT return-to-duty process.

Drivers testing **0.02–0.039 BAC** are removed from duty for at least **24 hours**.

7 Training & Supervisor Responsibilities

- All hiring managers and road supervisors receive **2 hours** of drug- and alcohol-impairment recognition training (as required by 49 CFR 382.603).
- The Safety Manager maintains a test-selection log, custody records, and annual MIS summary.

8 Enforcement & Disciplinary Action

Violation	Action
Alcohol concentration > 0.00 % while on duty	Immediate termination
Positive drug test or refusal	Removal from service; possible termination; mandatory SAP and follow-ups if retained
Disqualifying driving or criminal offense	Immediate suspension pending investigation; termination if confirmed
Failure to report new violations	Disciplinary action up to termination

9 Recordkeeping & Confidentiality

CLH Transportation Services LLC Policy

All screening records are stored in secure, access-controlled electronic files. Upon request, they are available to the Pennsylvania Public Utility Commission, Department of Transportation, and other authorized agencies.

10 Policy Review

This policy is reviewed **annually** by the Safety Manager and updated whenever regulations change.

11 Driver Indemnification & Hold-Harmless

The Driver agrees to **indemnify, defend, and hold harmless** CLH Transportation Services LLC, its members, managers, employees, and agents from and against all claims, demands, damages, losses, liabilities, costs, or expenses (including reasonable attorneys' fees) arising out of or related to the Driver's negligent, reckless, or intentional acts or omissions, violations of law, or breach of this Policy, **except** to the extent such claims arise from the sole negligence or willful misconduct of CLH.

12 Driver Acknowledgement

I have received, read, and understand CLH Transportation Services LLC's Driver Qualification, Background Screening, and Drug & Alcohol Testing Policy. I further acknowledge the **Indemnification & Hold-Harmless** obligations outlined in Section 11 and agree to comply with them, I agree to comply with its requirements as a condition of driving for CLH

Driver Name: Collis Hemending Signature: Collis Hemending Date: 04-30-2015

Questions about this policy should be directed to the Safety & Compliance Department at CLHTransportationServices@gmail.com.

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Pennsylvania limousine-driver rules (52 Pa. Code Subchapter F)

Code section	What it really says—short version
§ 29.502 – Current driver’s license required	You can’t let anyone drive for you unless they hold a <i>valid, non-expired</i> driver’s license. If the license is suspended or revoked—even for a day—the driver must come off the road.
§ 29.503 – Age restrictions	Drivers must be 21 years or older . (Paratransit carriers can use 18-to-20-year-olds, but limousine companies cannot.)
§ 29.504 – Driver history	<ul style="list-style-type: none"> • Pull a PennDOT driving record (MVR) <i>before</i> you hire. • Pull it again after 1 year, then every 2 years after that. • Keep each MVR on file at least 2 years.
§ 29.505 – Criminal history	<ul style="list-style-type: none"> • Run a criminal-background check on the same schedule as the MVR—pre-hire, after 1 year, then every 2 years. • Certain crimes (DUI, felony theft, violence, sex offenses, terrorism) automatically disqualify a driver for 7 years, 10 years, or life, depending on the offense. • Keep the report 3 years.
§ 29.506 – Alcohol prohibition	A driver may not operate with <i>any</i> measurable alcohol in their body—not even a single beer. Zero-tolerance .
§ 29.507 – Controlled-substance prohibition	Same zero-tolerance rule for illegal drugs or prescription meds that impair driving. Any amount detected = off the road.

Why the policy also names federal rules.

CLH Transportation Services LLC Policy

Federal citation In a nutshell	Federal citation In a nutshell
<p>49 CFR Part 40 – DOT testing procedures Sets the “how”: lab methods, chain-of-custody forms, what drugs to test, medical-review-officer (MRO) process, record-keeping, etc. Every transportation company that does drug/alcohol testing must follow these steps.</p>	<p>49 CFR Part 40 – DOT testing procedures Sets the “how”: lab methods, chain-of-custody forms, what drugs to test, medical-review-officer (MRO) process, record-keeping, etc. Every transportation company that does drug/alcohol testing must follow these steps.</p>
<p>49 CFR Part 382 – FMCSA driver testing rules Sets the “when and who” for commercial-vehicle drivers: pre-employment, random, post-accident, reasonable-suspicion, return-to-duty, and the Drug & Alcohol Clearinghouse reporting. Even if your limousines are under CDL weight, adopting Part 382 standards shows regulators and insurers you meet the toughest national benchmark.</p>	<p>49 CFR Part 382 – FMCSA driver testing rules Sets the “when and who” for commercial-vehicle drivers: pre-employment, random, post-accident, reasonable-suspicion, return-to-duty, and the Drug & Alcohol Clearinghouse reporting. Even if your limousines are under CDL weight, adopting Part 382 standards shows regulators and insurers you meet the toughest national benchmark.</p>

How it all fits together

1. **Hire only eligible drivers** ⇒ §§ 29.502-29.505
Check the license, look at the driving record, run a criminal background.
2. **Keep them eligible** ⇒ repeat the checks on the schedule set in § 29.504 & § 29.505.
3. **Zero tolerance for booze or drugs on duty** ⇒ §§ 29.506-29.507.
4. **Test the right way, at the right times** ⇒ Follow Part 40 (procedures) and Part 382 (timing/frequency).

If you follow those four pillars, you’ll satisfy both the Pennsylvania Public Utility Commission (PUC) and the U.S. Department of Transportation (DOT), without spending money on an attorney to interpret the basics.

The “§” symbol is shorthand for the word “**section.**”
When you see it doubled—“**§§**”—it simply means “**sections**” (plural).

So:

CLH Transportation Services LLC Policy

- § 29.502 → *section 29.502*
- §§ 29.502 – 29.507 → *sections 29.502 through 29.507* (a range of sections within the same chapter of the Pennsylvania Code)

Lawyers and regulators use these symbols to keep citations compact.

0.02–0.039 BAC is simply a **range of blood-alcohol concentration** levels.

Piece	What it stands for	Why it matters in the policy
BAC	“Blood Alcohol Concentration” – the amount of alcohol in a person’s bloodstream, measured as a percentage. 0.02 BAC means 0.02 grams of alcohol per 100 millilitres of blood (often written 0.02%).	
0.02	The lower end of the range—about one normal drink for an average-size adult.	
0.039	Just under 0.04 BAC, which is the federal cut-off for a “positive” test under DOT rules.	
Why the range exists	Pennsylvania’s limo rules—and the DOT model policy—treat any detectable alcohol as disqualifying. But they separate the penalties:	
• 0.02–0.039 BAC	The driver isn’t legally “intoxicated,” yet they’re still impaired enough for safety concerns. Your policy tells supervisors to remove the driver from service for at least 24 hours .	
• ≥ 0.04 BAC	This counts as a <i>positive alcohol test</i> under federal law. The driver must be yanked from service immediately , reported to the Clearinghouse (if CDL) and go through the full DOT “return-to-duty” process with a Substance Abuse Professional.	

So that “0.02–0.039 BAC” line means:

If a test finds the driver’s BAC anywhere between 0.02 % and 0.039 %, they’re not allowed to drive for the next 24 hours (minimum), even though it’s below the 0.04 % federal ‘positive’ threshold.

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CLH TRANSPORTATION SERVICES LLC
21 S 14TH ST
DARBY PA 19023-1207

BUSINESS SAVINGS

DATE	TRANSACTION DESCRIPTION	AMOUNT	BALANCE
02/01	Balance Forward		7540.24
02/05	Withdrawal Home Banking Transfer To HEMERDING,LYNETT XXXXXXXXXXXX Share 0001 02/05/2025 08:11 170985	-3000.00	4540.24
02/05	Deposit Home Banking Transfer From HEMERDING,COLLI XXXXXXXXXXXX Share 0004 02/05/2025 08:12 171003	1500.00	6040.24
02/06	Withdrawal Home Banking Transfer To HEMERDING,COLLIS XXXXXXXXXXXX Share 0004 02/06/2025 09:44 184766	-500.00	5540.24
02/07	Withdrawal Home Banking Transfer To HEMERDING,COLLIS XXXXXXXXXXXX Share 0004 02/07/2025 19:53 211515	-500.00	5040.24
02/12	Deposit Home Banking Transfer From HEMERDING,COLLI XXXXXXXXXXXX Share 0004 02/12/2025 22:10 266917	1000.00	6040.24
02/27	Withdrawal Home Banking Transfer To HEMERDING,LYNETT XXXXXXXXXXXX Share 0001 02/27/2025 01:27 452321	-2000.00	4040.24
02/28	Deposit Dividend 0.100% For the period 02/01/25 to 02/28/25 Your Annual Percentage Yield Earned was 0.100% Based on an average daily balance of 5915.24	0.46	4040.70
02/28	Ending Balance		4040.70

BUSINESS BASIC CHECKING

DATE	TRANSACTION DESCRIPTION	AMOUNT	BALANCE
02/01	Balance Forward		1204.52
02/08	Withdrawal Debit Card CHECK CARD AGENCY INSURANCE COMPANY 800-4925629 MD - 02/07	-385.06	819.46
02/21	Deposit Home Banking Transfer From HEMERDING,COLLI XXXXXXXXXXXX Share 0004 02/21/2025 12:21 382403	1000.00	1819.46
02/24	Withdrawal ACH GM Financial TYPE: GMF Pymt ID: I522190781 CO: GM Financial NAME: COLLIS HEMERDING	-1571.33	248.13
02/28	Ending Balance		248.13



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BUSINESS BASIC CHECKING (Cont.)

DATE TRANSACTION DESCRIPTION AMOUNT BALANCE

Total Overdraft for period is: 0.00
 Total Overdraft for year-to-date is: 0.00
 NSF fees for period is: 0.00
 NSF fees for year-to-date is: 0.00

SUMMARY FOR PERIOD

ACCOUNT	PREVIOUS BALANCE	DEPOSITS/ OTHER CREDITS	WITHDRAWALS/ OTHER DEBITS	FEEs	ENDING BALANCE	INTEREST PAID FOR YEAR
[REDACTED]	7,540.24	2,500.46	-6,000.00	0.00	4,040.70	0.85
	1,204.52	1,000.00	-1,956.39	0.00	248.13	0.00
TOTAL DIVIDEND YEAR-TO-DATE			0.85			
				TOTAL FINANCE CHARGE YEAR-TO-DATE		0.00
Dividends shown if over \$10.00 will be reported to the Internal Revenue Service for this calendar year.				for all loans on this account.		

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 Fort Washington, PA 19034-2712

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BUSINESS SAVINGS

DATE	TRANSACTION DESCRIPTION	AMOUNT	BALANCE
03/01	Balance Forward		4040.70
03/10	Withdrawal Home Banking Transfer To Share 0094 03/10/2025 12:55 632158	-1000.00	3040.70
03/31	Deposit Dividend 0.100% For the period 03/01/25 to 03/31/25 Your Annual Percentage Yield Earned was 0.100% Based on an average daily balance of 3331.02	0.29	3040.99
03/31	Ending Balance		3040.99

BUSINESS BASIC CHECKING

DATE	TRANSACTION DESCRIPTION	AMOUNT	BALANCE
03/01	Balance Forward		248.13
03/10	Deposit Home Banking Transfer From Share 0090 03/10/2025 12:55 632158	1000.00	1248.13
03/11	Withdrawal ACH IPFS855-212-6850 TYPE: IPFSPMTCAP ID: 0AD2424370 CO: IPFS855-212-6850	-1027.58	220.55
03/21	Deposit Home Banking Transfer From HEMERDING, COLLI XXXXXXXXXXXX Share 0004 03/21/2025 13:07 788567	1600.00	1820.55
03/24	Withdrawal ACH GM Financial TYPE: GMF Pymt ID: I522190781 CO: GM Financial NAME: COLLIS HEMERDING	-1571.33	249.22
03/31	Ending Balance		249.22

Total Overdraft for period is: 0.00
 Total Overdraft for year-to-date is: 0.00
 NSF fees for period is: 0.00
 NSF fees for year-to-date is: 0.00



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