

Anyelo Vega

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5702056445

5/16/2025

C-2025-3054978- jbs 5/20/25

Pennsylvania Public Utility Commission

Bureau of Investigation and Enforcement

Docket No. C-2025-...

Dear Matthew L. Homsher, Secretary

Pennsylvania Public Utility Commission

Commonwealth Keystone Building

400 North Street Harrisburg, PA 17120

**Respondent, G5 Taxi Inc., by and through its authorized representative, respectfully submits the following responses to the numbered paragraphs of the Formal Complaint filed by the Bureau of Investigation and Enforcement (I&E):**

1. Admitted

2. Admitted

3. Admitted

4. Admitted

5. Admitted

6. Admitted. Correction: The address is 100 N Wilkes Barre Blvd, Suite 302, Wilkes Barre, PA 18702.

7. Admitted

8. Admitted

9. Admitted

10. I did not receive the letter that says paragraph 10. ("On September 9, 2024, The Commission informed Respondent that its certificate of public convenience at A-6325884 was canceled for non-compliance with Commission regulations and failure to respond to a Motor Carrier complaint filed at C-2024-3049071). On September 23, I go to DMV Harrisburg to renew a week before I was supposed to renew the car registrations, at first I waited my turn until they attended to me, when I was at the Window I told them I came to renew, the person asked me for my license and the renewal letter that said the mileage of the cars and all that and in less than 5 minutes at the window they gave me all the registrations, I made the payment and I asked them is that all? They answered yes and I was surprised by the speed of the service, I made the payment, I took my papers and I left the window, when I was getting to my vehicle the person who helped me calls me and tells me that there was a problem and that I should return to the Window. He asks me for the papers and tells me that PUC has a hold on my certificate and that therefore they cannot renew the registrations. I ask him what the problem is. They come back and tell me that I have a hold on the PUC and that therefore I should contact the PUC. They return my money and tell me that when I resolve the situation with the PUC, I should come back and they will process me. At that moment, I find out that I have a HOLD.

Then I call PUC they tell me that I should contact Tatiana, they give me the number but it says I can leave a message, for two days I kept calling and I couldn't get in touch with Tatiana so I asked my sister to help me and she was able to contact Tatiana and told her that I had to pay for two tickets that the company had received, I bought the money orders and went back to Harrisburg to the PUC building, I was able to talk to Mr. Brown, he personally received the money orders and explained to us what was happening, I explained to him that we never received the letter and that because of two tickets we weren't going to let everything go to waste, the understanding and he told us that the best thing we could do was to reapply for a new certificate, at the moment I was under a lot of stress thinking that if I paid those tickets everything would go back to normal, then my sister continued insisting on talking to Tatiana to send the authorization to DMV to remove the Hold, that week a PUC official thinking that they were taking action on the matter and that they were only going to do an inspection of the vehicles, I realize that it is due to a complaint about a driver who worked with us months before but was no longer there, I pass him the driver's file and he tells me that this driver has a report and that he has to inspect the vehicle because the vehicle doors did not open (the doors of that vehicle are automatic) and due to

situations of clients who left without pay until the customer paid the fare, that driver would not remove the lock from the doors.

- In May I don't remember exactly the day a G5 Taxi driver was stopped by PUC officers because he didn't have the dome light, that made some of the drivers were inspected for not having an adapted meter in the vehicle. We were using at that time a meter from an application called Taxi Caller which on the day of the inspection I received a certificate thinking that they had approved the use of our meters in the phone (the reason why we don't use the adapted meters in the vehicle is because when I installed a meter for the Latino Taxi Service company I realized that the cables arrived cut or looked like they had been torn off that made me think that the meters were being stolen from the vehicles which the vast majority came from the state of New York and one day in a conversation I heard a taxi driver say that he always removed the meter from the vehicle so that it wouldn't be stolen and that made me understand that if it was happening in New York it was only a matter of time before such cases happened. will begin to happen and also the company that manufactured those meters had closed and there was no more production) I explained this same situation to the PUC official who attended us that day and I also told him about an application so that our citizens can order their taxis, something similar to UBER and he explained to me that as long as the call went through the base everything would be fine at that time it was something that was in development.

In mid-December I called some drivers to tell them that we have the permit to operate, Some of them already knew that the application was on Google only, And something said by the Subaru driver that he was doing Uber at that time And decided to turn on the G5 Taxi app. to see if it was true that we were operating and that call came to him, it should be noted that at this time the application had not been published And it was not created with bad intentions. I was not aware that this driver could connect directly to the application to work using your old login and password when I closed the taxi app I thought everything would automatically crash, at the time of the incident I was on my way to Harrisburg.

11. The passenger never call to our office to report the incident that a complaint was received; denied as to the characterization of the facts alleged by the passenger.

12. Admitted

13. Admitted

14. Admitted

15. Admitted

16. Admitted

17. Admitted

18. Admitted

19. Admitted. (I call from my Phone)

20. Admitted

21. Admitted. From the beginning, driver Robert Conway was warned that the car belonged to a person who owns a mechanic's shop and that he should report any problems with the vehicle so that it could be repaired immediately.

22. Denied. There was a tariff displayed inside the taxi before being giving to Mr. Conway. Respondent uses an app-based soft meter which it believes complies with Commission requirements.

23. Admitted. The application as a taximeter is not used in bad faith.

24. Admitted

25. Admitted. Explained in 10. I was not aware at the time and the driver acted on his own.

26. Admitted. Explained in 10. I was not aware at the time and the driver acted on his own.

27. Admitted. Explained in 10. I was not aware at the time and the driver acted on his own.

28. I was not aware at the time and the driver acted on his own.

29. I was not aware at the time and the driver acted on his own.

30. I was not aware at the time and the driver acted on his own.

31. I was not aware at the time and the driver acted on his own.

32. I was not aware at the time.

33. Explained in 10.

34. Admitted

35. Respondent regrets the oversight and did not intend to mislead the Commission or the Bureau of Investigation and Enforcement.

36. Admitted

37. Denied Explained in 10.

38. Denied Explained in 10.

39. Denied Explained in 10. Respondent believes the app is used by customers but not as a dispatch system under regulatory definition.

40. Admitted Explained in 10.

### **III. ALLEGED VIOLATIONS**

#### **Counts 1–11: Operating without Authority**

42. Denied. Respondent denies operating without authority and denies that the trip sheet confirms unlawful activity.

#### **Count 12: Failure to Equip a Meter**

43. Denied. Respondent uses a soft meter via a smartphone application and has applied for approval accordingly.

#### **Count 13: Failure to Post Tariffs in Cab**

44. Denied. Respondent posted rates digitally through the E-Filing .

#### **Counts 14–15: Failure to Furnish Records**

45. Denied. Respondent provided requested information to the best of its ability and disputes any intentional withholding of documents.

#### **Count 16: Disqualified Driver**

46. Denied. Respondent was unaware of the disqualifying conviction at the time of hire and took corrective action upon learning of it.

### **CONCLUSION**

WHEREFORE, Respondent respectfully requests that the Pennsylvania Public Utility Commission dismiss the Formal Complaint, or in the alternative, that the matter proceed to hearing where Respondent can present evidence and testimony in its defense.

**Respectfully submitted,**

**G5 Taxi Inc.**

By: Anyelo Vega

Owner

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**Date:** 5/16/2025