



**COMMONWEALTH OF PENNSYLVANIA**

PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET  
HARRISBURG, PENNSYLVANIA 17120  
<http://www.puc.pa.gov>

June 26, 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 'Matthew L. Homsher'.

Matthew L. Homsher, Secretary

Enclosure

cc: Josh Kwiatkowski

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GREATER WORK TRANSIT SERVICES, LLC  
Data Request

1. Previously you provided sworn statements (verified per 52 Pa Code § 1.36) in which you stated that Megan Alvarez was a member of your management team and implied that her experience played a significant role in the applicant's ability to provide safe, efficient, and reasonable service. However, most recently, you have provided information which indicates that Ms. Alvarez was not actually an employee or part of the management structure of the applicant at all, but rather an independent consultant requiring a 1099.

Please explain the discrepancy in the two sworn positions, and a statement explaining how the previously sworn statements did not include intentionally false information.

Megan has experience with transportation, with Megans experience she was hired to consult and assist with a start up as a 1099 employee. Once the startup was complete Megan's role would also support daily operations and billing. Although I am well versed in creating routes, manifests, billing, policies and procedures per childcare regulations, Megan's was contracted to support Greater Work Transit transition into the non medical emergency transportation business. My previous sworn statements did not include intentionally false information. Megan has supported creating policies and procedures for my company. Megan has also assisted with providing information to obtain contracts, with the intent to provide a safe and reasonable service. As stated before, I currently operate my transportation company per childcare regulations as children/students are my only clients at the moment. The attempt to obtain the PUC license began in March, and at the moment I did consider Megan a part of my management team rather she was paid with a 1099 and or added to payroll at a later time. My definition of a manager is a senior professional who collaborates with owners and operators to establish and achieve business goals. Megan's role was to consult and manage operations that ensured Greater Work Transit grew effectively. Megan Alvarez supported resource allocation, policies and procedures, and risk management until separation in June.

2. Previously you were requested to provide a current copy of both Tierra Carroll's and Megan Alvarez's drivers' license, or other government issued identification (for verification purposes). As Ms. Alvarez is not, and was not, an actual employee of the company her information will no longer be required; however, Ms. Carroll's information still has not been submitted. Please provide the previously requested information.

My drivers license was submitted with my previous responses, however, I attached a

copy of my license again. Thank you

**Ensure that your reply includes the requisite sworn statement and SIGNATURE. The most recent reply failed to include this statement.**