

Phone: 412-307-4347

**Date:** August 11, 2025

**To:** Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building  
400 North Street Harrisburg, PA 17120

**RE: Response to Data Request – Docket No. A-2025-3056308**

Dear Secretary Homsher,

On behalf of Leasing World Enterprises, LLC, T/A Mobility Transit, I am submitting the enclosed materials in response to the Pennsylvania Public Utility Commission's correspondence dated July 22, 2025, regarding our application under Docket No. A-2025-3056308.

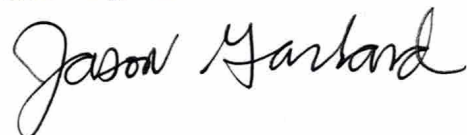
We have carefully reviewed the Commission's requests and have provided the following:

- A revised and fully compliant response to Question #5, including a detailed driver qualification plan addressing §§ 29.503–29.505.
- Complete answers to all portions of Question #6.
- Clarification and documentation regarding daily vehicle inspection procedures.
- Projected annual commercial insurance costs and verification of Form E compliance.
- A revised and dated Statement of Financial Position, including supporting documentation such as bank statements, vehicle registrations, and property titles, all held in the name of Leasing World Enterprises, LLC.

All responses are verified in accordance with 52 Pa Code § 1.36 and include the required verification statement signed by the appropriate company representative.

We appreciate the Commission's guidance and remain committed to full compliance with all applicable regulations. Should any additional information be required, please do not hesitate to contact us.

Sincerely, **Jason Garland** Co-Owner Leasing World Enterprises, LLC T/A Mobility Transit

A handwritten signature in black ink that reads "Jason Garland". The signature is written in a cursive, flowing style.

I, Jason Garland, 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).

Jason Garland  
JASON GARLAND  
Title: CO/OWNER  
DATE: 8/11/25

Verification Statement (§ 1.56)

I, Jason Garland Sr., 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).

Signed: Jason Garland Sr.

Printed Name: Jason Garland Sr.

Title: Co/Owner

Date: ~~July 23,~~ 2025

Aug 8,

## Driver Staffing & Operational Scope

### Driver Quantity & Adequacy – Initial Launch Plan

LEASING WORLD ENTERPRISES LLC, T/A MOBILITY TRANSIT will begin operations with **two owner-operators**, both of whom are company principals and trained paratransit drivers.

### Why This Is Adequate

- Initial service will be limited to **one contracted nursing facility**, providing scheduled transportation to:
  - Doctor’s appointments
  - Day program facilities
  - Outpatient treatments and errands
- Trips will be **scheduled in advance** with 24–48-hour lead times.
- By operating as owner-drivers:
  - We maintain **complete control over safety, professionalism, and compliance**
  - Scheduling and dispatch are streamlined to reduce wait times
  - Oversight is immediate—ensuring direct accountability and passenger trust

This lean staffing model aligns with the projected volume of trips and supports quality assurance during startup. Expansion of driver personnel will occur as additional contracts and facilities are added to our service area.

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# DRIVER HIRING & COMPLIANCE POLICY MANUAL

## **1** Driver Hiring Standards

Mobility Transit adheres to strict standards when selecting drivers to ensure safety, professionalism, and legal compliance:

- All applicants must be **at least 18 years old** per § 29.503.
- Applicants must possess a **valid driver's license** appropriate for the vehicle class they will operate.
- Applicants must submit a **three-year motor vehicle history (MVR)** at time of application.
- Applicants must undergo a **state and federal criminal background check**.
- Preference given to candidates with experience transporting passengers with disabilities.
- Drivers must be capable of performing pre-trip inspections and post-trip securing mobility devices.

## Driver Qualification & Compliance Plan

### ◇ § 29.503. Driver Age


- All drivers shall be at least **18 years of age**.
- Age is verified through **state-issued photo ID or driver's license** prior to hiring.
- Copies of documentation are retained in secure driver files.

### ◇ § 29.504. Driving History – Schedule & Retention

- A **3-year Motor Vehicle Record (MVR)** is obtained before hiring.
- MVRs are reviewed **annually**, or as needed following incidents or complaints.
- Records are securely retained for a **minimum of four years** after driver separation.

### ◇ § 29.505. Criminal History – Schedule & Retention

- Drivers undergo **state and federal criminal background checks** before hiring.
- Checks are conducted **annually** or upon reasonable cause.
- All criminal history documents are retained for **no less than four years** post-employment.

 All files are stored in encrypted digital systems or locked cabinets, with access limited to designated company personnel.

## Criminal Background Check Protocol

Mobility Transit contracts with a licensed third-party screening agency to conduct criminal background investigations:

- Background checks are conducted **before hire** and reviewed for disqualifying offenses.
- All checks cover **state and federal databases**.
- Criminal histories are reviewed for offenses involving:
  - Violence
  - Substance abuse
  - Theft or fraud
  - Sexual misconduct
- Criminal history checks are repeated **annually** or upon incident.
- All background reports are **retained for a minimum of four years** after driver separation per § 29.505.

## Driver Training Program

Mobility Transit provides structured training for every new driver to ensure compliance and safe operations.

### **Topics Covered:**

- Passenger sensitivity and communication (especially with intellectual and physical disabilities)
- ADA regulations and safe wheelchair handling
- Pre-trip and post-trip inspection procedures
- Defensive driving and safe maneuvering
- Incident reporting and emergency response
- PUC rules and regulations for paratransit vehicles

### **Schedule:**

- Initial training: **8 hours classroom, 4 hours supervised field operations**
- Refresher training: **Annually**, or after incident/complaint

Training records are retained throughout the driver's employment and for **four years after separation**.



## **Response to Question #6 – Updated**

1. **Experience & Training** Management has **12 years of experience operating a business that served individuals with intellectual disabilities**, dispatching vehicles daily for **doctor’s appointments, day programs, and related support services**. Drivers receive comprehensive **onboarding and sensitivity training** to ensure respectful, safe, and professional passenger interactions.
2. **Vehicles & Equipment** One **ADA-compliant van equipped with a wheelchair lift** will be utilized for service and will be **titled under Leasing World Enterprises LLC** to satisfy Commission asset requirements.
  - **Dispatching Procedures:** Dispatch is conducted using real-time apps and scheduling tools.
  - **Customer Service:** Passengers have access to direct phone/email for support; complaints are tracked and addressed.
  - **Insurance:** Commercial auto and liability coverage is maintained; provider will file Form E electronically.
  - **Driver Vetting:** Policies follow all PUC requirements outlined in §§ 29.503–29.505.

# Confidentiality & Records Retention

To ensure the integrity of driver documentation and protect sensitive information, the following policies apply:

## **1** Secure Storage Protocols

- All driver files—including hiring records, criminal history reports, MVRs, training certifications, and drug/alcohol test results—are stored in:
  -  Locked file cabinets for physical records
  -  Encrypted, password-protected digital folders for electronic files
- Access is strictly limited to authorized personnel designated by company ownership or management.

## **2** Retention Schedule

- In accordance with 52 Pa. Code §§ 29.504 and 29.505:
  - **Driver history records (MVRs)** are retained for **4 years** after termination.
  - **Criminal background check records** are retained for **4 years** post-employment.
  - **Drug and alcohol test results** are retained for:
    - **5 years** for positive results (per federal guidelines)
    - **2 years** for negative or cancelled tests
  - **Training records** are retained throughout employment and for **4 years after separation**.
  - **Incident reports and disciplinary actions** remain in the file for **at least 4 years**, or longer if legally required.

## **3** Data Usage & Disclosure

- Personal data collected during the hiring and employment process is:
  - Used strictly for regulatory compliance, insurance documentation, and internal safety oversight.
  - Not disclosed to third parties except as required by law, subpoena, or PUC audit procedures.

- Drivers may request a copy of their file contents upon written notice and verification of identity.

#### **4 Audit Readiness**

- Driver records are organized and maintained in formats compatible with **PUC audit requests.**
- Logs and forms are reviewed monthly for completeness and accuracy.
- Files may be securely transmitted to the PUC upon written request via the

## **Driver Staffing Plan – Initial Operations**

To begin operations, **LEASING WORLD ENTERPRISES LLC, T/A MOBILITY TRANSIT** will employ **two owner-operators** as active drivers. This initial team is adequate for the scope of service we plan to provide during our startup phase.












### ***Reasoning for Adequacy:***

- We plan to serve a **single contracted nursing facility**, transporting residents to and from medical appointments, dialysis, and day programs.
- Operating as owner-drivers ensures:
  - Direct oversight of service quality
  - Consistency in training and compliance
  - Immediate responsiveness to passenger needs
- Trips will be scheduled with a **minimum of 24 hours' notice**, allowing our team to plan routes efficiently without overextending capacity.
- Our ADA-compliant vehicle will be used for **one-on-one or small group paratransit**, minimizing strain on scheduling and vehicle wear.

As the business grows and we add new contracts or routes, we will recruit additional drivers in full compliance with 52 Pa. Code §§ 29.503–29.505 and expand our training and screening systems accordingly.







# Daily Vehicle Inspection Procedure

## Pre-Trip Inspection Checklist (Completed Before Each Shift)

Component	Inspection Task
 Brakes	Test brake pedal feel & response
 Lights	Verify headlights, brake lights, turn signals, hazard lights
 Tires & Wheels	Check tire pressure, tread wear, visible damage
 Fluid Levels	Inspect oil, coolant, transmission fluid, and windshield washer fluid
 Steering & Suspension	Ensure smooth, controlled movement
 Horn	Check for full volume and responsiveness
 ADA Equipment	Verify wheelchair lift is operational, secured, and free of obstruction
 Mirrors	Confirm clean and properly positioned
 Interior Condition	Remove debris, check for spills or hazards
 Fire Extinguisher & First Aid	Present and fully stocked
 Documentation	Verify driver's license, insurance, and registration are on board

 All findings must be logged in the Daily Inspection Log and submitted weekly for management review.

## Post-Trip Inspection Checklist (Completed at End of Each Shift)

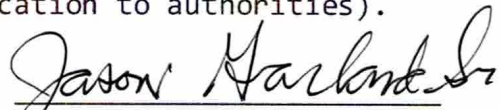
Component	Inspection Task
 Cleanliness	Remove trash, sanitize interior surfaces
 Incident Documentation	Record any unusual noises, accidents, or mechanical issues
 Wheelchair Equipment	Check lift wear, straps, and securement points
 Electronics	Ensure dashboard warning lights are clear
 Maintenance Needs	Log any repairs or service needs
 Inventory Check	Restock first aid supplies if needed

Drivers sign the log daily to confirm that inspections were completed before and after each shift. Safety concerns must be reported immediately to dispatch or management.

## Verification Statement (§ 1.36)

I, Jason Garland Sr., 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).

Signed:



Printed Name: Jason Garland Sr.

Title: Co/Owner

Date: July 23, 2025

ASSETS

Current Assets		
Cash		\$ 30000. <sup>00</sup>
Other Current Assets (specify)		
Total Current Assets		<u>30000.<sup>00</sup></u>
Tangible Assets		
Motor Vehicle Equipment		
Property (buildings, land, etc.)		
Office Equipment		
	TOTAL ASSETS	<u>                    </u>

LIABILITIES

Current Liabilities (Due within one year of date)		
Loans	0	
Credit cards/revolving credit	0	
Other Liabilities (Attach schedule)	0	0
Total Current Liabilities		<u>                    </u>
Long Term Liabilities (Due after one year of date)		
Mortgage	0	
Long term commercial loan	0	
Other Liabilities (Attach Schedule)	0	0
Total Long-Term Liabilities		<u>                    </u>
	TOTAL LIABILITIES	<u>                    </u>

Vehicle purchases has not been  
Completed. waiting on Pvc License Approval.

Additional Relationships

Tax Name: LEASING WORLD ENTERPRISES  
LLC (6349341)

**Summary**

Memo Ledger Balance:	\$30,038.00	Last Deposit Jul 02, 2025:	\$400.00
Memo Available Balance:	\$38.00	Last Check Jul 10, 2025:	\$800.00
Current Ledger Balance:	\$38.00	Date Opened:	May 28, 2025
Current Available Balance:	\$38.00		
Overdraft Limit:	\$200.00		
ATM/POS Overdraft Balance:	\$0.00		

**Memo Balances**

Current Ledger Balance:	\$38.00	Current Reg CC Cash Available:	\$38.00
Plus Presentments:	\$30,000.00	<b>Memo Available Balance:</b>	<b>\$38.00</b>
<b>Memo Ledger Balance:</b>	<b>\$30,038.00</b>		

**Holds**

	Amount	Reason	Expiration Date
+	\$0.00	REG CC HOLD	Jul 24, 2025
+	\$0.00	REG CC HOLD	Jul 25, 2025
+	\$0.00	REG CC HOLD	Aug 01, 2025

**Projected Float and Holds**

Projected Date	Float	Reg CC Check Available Float	Reg CC Cash Available Float	Expiring Holds
Jul 23, 2025 Wednesday				
Jul 24, 2025 Thursday				
Jul 25, 2025 Friday				
Jul 26, 2025 Saturday				
Jul 27, 2025 Sunday				
Jul 28, 2025 Monday				
Jul 29, 2025 Tuesday				
Jul 30, 2025 Wednesday				
Jul 31, 2025 Thursday				
Aug 01, 2025 Friday				
Aug 02, 2025 Saturday				
Aug 03, 2025 Sunday				



**First National Bank**

**Dominic Saunders**  
Relationship Banker  
NMLS # 2639046

FOX CHAPEL  
1195 Freeport Road  
Pittsburgh, PA 15238

OFFICE: 412-963-8363  
FAX: 412-593-5259  
EMAIL: saundersdo@fnb-corp.com

**Service Charge**

Date Last Service Charge:	Jun 30, 2025	Service Charge Cycle:	[29] Month-End
Average Ledger Balance:	\$347.09	Activity Method:	16
Average Available Balance:	\$347.09	DDA Credit Back Identification:	0



Jason Garland <jgarland3512@gmail.com>

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## 2025 - 2026 Quote - Auto Liability

1 message

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Jean Zuluaga <Jzuluaga@sovtran.com>  
To: Jason Garland <jgarland3512@gmail.com>

Thu, Aug 7, 2025 at 12:31 PM

Good morning, Jason.

I hope your week has gone well so far! I am pleased to present you with the following insurance rate through Berkshire Hathaway Insurance. I think you will be pleased as well. Please see below for coverage and Rates.

### Commercial Auto (1 Units)

Limit of Liability - \$500,000 CSL (Symbols 7)

First Party Benefits included

**Annual Premium - \$13,317.00**

Direct Bill through Berkshire Hathaway with a **down payment of \$2,664.00** and then you will have **10 monthly installments of \$1,065.36**

### Quote Contingent Upon the Following

Clean MVRs

All drivers cell phone numbers

\*\*Quote is valid for 7 business days\*\*

I will give you a call in just a minute to make sure you received this email and answer any questions you may have. Thank you for the opportunity to rate this coverage for your company!

Thank you!

**Jean Zuluaga**, CLIENT ADVOCATE

**Sovereign Transportation Insurance, LLC**

○ 678.996.3408

TF 866.455.5413

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**From:** Jason Garland <[jgarland3512@gmail.com](mailto:jgarland3512@gmail.com)>

**Sent:** Thursday, August 7, 2025 12:10 PM

**To:** Jean Zuluaga <[Jzuluaga@sovtran.com](mailto:Jzuluaga@sovtran.com)>

**Subject:** Re: Leasing World Enterprises LLC DBA mobility transit - Quote Request 2025 - 2026

Good morning,

The vehicle is wheelchair accessible. We are not working with a NEMT Broker. The business was established in 2025 . Thank you.

On Thu, Aug 7, 2025 at 11:10 AM Jean Zuluaga <[Jzuluaga@sovtran.com](mailto:Jzuluaga@sovtran.com)> wrote:

Good morning Jason,

Thank you for sending me the information. I will be needing the following in order to proceed.

1. Is the vehicle Wheelchair accessible?
2. Are you going to be working with a NEMT Broker?
3. What is the business established date.

Thank you!

**Jean Zuluaga**, CLIENT ADVOCATE

**Sovereign Transportation Insurance, LLC**

O 678.996.3408

TF 866.455.5413

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**From:** Jason Garland <jgarland3512@gmail.com>

**Sent:** Wednesday, August 6, 2025 5:19 PM

**To:** Jean Zuluaga <Jzuluaga@sovtran.com>

**Subject:** Re: Leasing World Enterprises LLC DBA mobility transit - Quote Request 2025 - 2026

Hello Jean,

Please see attached supplemental insurance information. Thank you.

On Tue, Aug 5, 2025 at 3:16 PM Jean Zuluaga <Jzuluaga@sovtran.com> wrote:

Good afternoon,

I am writing you in reference to insurance for your transportation business! At Sovereign, we specialize in insuring non-emergency medical transportation businesses. We are the endorsed source for insurance by MTM and currently represent in excess of 700 transportation businesses nationally.

In order to get the quoting process started there are several items I will ultimately need from you, beginning with the attached application, and the additional items outlined below.

1. Up to date drivers list, showing name, DOB, and Driver's license number.
2. Current vehicle list, detailing seating capacity, lift or no lift, year, make, model, VIN#, and the current stated value (if you need comp and collision).
3. A copy of each vehicles registration.
4. Date your business was established.
5. Currently valued loss run reports from your current and previous insurance carriers detailing the past five years of loss history. If you have not yet been in business for five years, please provide auto and general liability loss runs for each year that you have been in business.
6. A list of contracts that you currently have in place (or are planning to have in place in the near term). i.e. LogistiCare/ModivCare, Access2Care, MTM, Verida etc. As well as a copy of your signed ModivCare contract if already executed.
7. A list of any state filings you require. For example: Form E, PUC, etc.
8. Lease agreements for any vehicles which are not owned or registered in your company name.

Please feel free to give me a call with any questions you may have while putting everything together. Once received, we will be able to turn the quotes around to you quickly.

I appreciate your time and look forward to working with you!

Thank you!

**Jean Zuluaga**, CLIENT ADVOCATE

**Sovereign Transportation Insurance, LLC**

O 678.996.3408

TF 866.455.5413

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Jason Garland <jgarland3512@gmail.com>

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## 2025 - 2026 General Liability Quote - Leasing World Enterprises LLC DBA mobility transit

1 message

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**Jean Zuluaga** <Jzuluaga@sovtran.com>  
To: Jason Garland <jgarland3512@gmail.com>

Thu, Aug 7, 2025 at 5:25 PM

Good afternoon, Jason.

I am pleased to present you with the following insurance rate through Scottsdale Insurance. Please see below for coverage, rates, and financing.

### **General Liability**

Limit of Liability - \$1,000,000 Per Occurrence w/ a \$2,000,000 aggregate

Medical Payments \$5000

**Annual Premium - \$2,392.31**

Financing is available through IPFS with a **down payment of \$779.60** and then you will have **10 monthly installments of \$177.00**

### **Quote Contingent Upon the Following.**

All drivers cell phone numbers

\*\*Quote is valid for 7 business days\*\*

If you would like to proceed with securing this coverage, I will put your proposal together and send it over to you. Once we have the signed proposal and down payment money, we can request coverage be bound. Down payments can be made via bank wire or with a debit/credit card via epay. Please note that since epay is a 3<sup>rd</sup> party vendor, they do charge a 3.5% service fee to all transactions made through their system.

I will give you a call in just a minute to make sure you received this email and answer any questions you may have. Thank you for the opportunity to rate this coverage for your company!

Thank you!

**Jean Zuluaga**, CLIENT ADVOCATE

**Sovereign Transportation Insurance, LLC**

O 678.996.3408

TF 866.455.5413

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