

September 17, 2025

DATE OF DEPOSIT

SEP 17 2025

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pennsylvania PA 17120

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Subject: Response to PA PUC Request for Additional Information dated September 16, 2025  
- Paratransit Application for Humane Care Transportation Service LLC (Docket No: A-20225-3057397)**

**To the Honorable Secretary of the Pennsylvania Public Utility Commission:**

Thank you for the opportunity to provide further information regarding our application for Motor Common Carrier of Persons in Paratransit Service in Pennsylvania. We understand the Commission's inquiry regarding our application. Please find detailed responses below:

**1a.) Ability to effectively serve the counties in our application.** Our initial application included a broader range of counties to reflect our long-term vision for providing quality paratransit service across the region. However, our immediate focus is a strategic, phased launch in **Philadelphia** and **Montgomery** counties. This approach allows us to establish a proven record of success and build a strong operational foundation before expanding our services. Our scaling strategy is built on this foundational success of our primary areas, and we will incrementally add resources and expand into the other counties listed in our application as both demand and our operational efficiency dictate, ensuring sustainable growth and consistent quality across our entire service area.

Our decision to begin with Philadelphia and Montgomery counties first is a deliberate one. It allows us to:

1. **Build a Strong Reputation:** Establish a reputation for exceptional service, which will be critical for our long-term success.
2. **Refine Operations:** Fine-tune our operational processes, technology, and training programs in a real-world environment before scaling to a larger service area
3. **Focus Resources:** Concentrate our initial resources, including personnel and vehicles, on a manageable territory to ensure service reliability and quality are at their highest from the outset.

Additionally, our plan for effective and reliable service delivery in this initial phase is multifaceted and centers on the following key pillars:

**Operational Strategy for Philadelphia and Montgomery Counties**

- **Centralized Dispatch and Advanced Paratransit Software:** Our operations will be powered by an industry-leading paratransit software system, which our IT team is in the process of evaluating. This technology will be the backbone of our ability to manage a high volume of trips efficiently and ensure ADA compliance. Some key features of our digitization strategy will include:

- **Automated Scheduling and Routing:** The software uses a sophisticated algorithm to automate trip scheduling and routing. It intelligently groups passengers with similar origins and destinations to create the most efficient routes, minimizing vehicle mileage and reducing travel times. This is particularly crucial for balancing service in the dense urban environment of Philadelphia with the more geographically spread-out suburban and rural communities in Montgomery County.
- **Real-Time Vehicle Tracking (AVL):** Every vehicle in our fleet will be equipped with an Automated Vehicle Location (AVL) system, which provides our dispatchers with real-time GPS tracking. This allows us to:
  - Monitor on-time performance and make immediate adjustments to routes in response to traffic, road closures, or other unforeseen events.
  - Provide accurate estimated times of arrival (ETAs) to passengers, which significantly reduces the number of "where's my ride?" calls to our call center.
  - Enhance passenger safety by allowing us to know the location of every vehicle at all times.
- **Integrated Driver and Passenger Apps:** Include a mobile application for our drivers, which provides them with their daily manifest, turn-by-turn directions, and a direct line of communication with dispatch. For passengers, a secure online portal or app allows them to book trips, view their ride status, and receive automated notifications about their pickup and drop-off.
- **Comprehensive Reporting and ADA Compliance:** The software's robust reporting capabilities will be used to track key performance indicators and ensure full compliance with ADA regulations. We will generate detailed reports on metrics such as On-time performance, Vehicle utilization and maintenance needs
- **Strategically Located Fleet:** Our fleet of vehicles will be strategically domiciled at our locations within and around both counties to minimize response times. Our Montgomery area will be served from 2615 Philmont Avenue, Huntingdon Valley PA 19006 and Philadelphia will be served from our existing location at 3235 Kensington Avenue, Philadelphia PA 19134. Our initial fleet will consist of 2 vehicles, all equipped with ADA-compliant lifts or ramps and safety systems. We will scale this fleet in direct response to service demand.
- **Comprehensive Staffing and Training:** Our hiring strategy focuses on recruiting drivers with an intimate knowledge of the service area's geography. As detailed in our proposal. This local insight is key to optimizing routes and navigating the specific traffic conditions of both urban and suburban environments. They will undergo extensive training that covers defensive driving, first aid, and disability awareness. This training ensures we provide safe, respectful, and compassionate service to every passenger.
- **Community Partnerships:** We will actively engage with county-level Area Agencies on Aging, disability advocacy groups, and local healthcare providers in both counties. These

partnerships will help us coordinate non-emergency medical transportation and other essential trips, ensuring we are integrated into the community's support network from day one.

**1b.) Ability to provide paratransit service from our authorized counties to other points in Pennsylvania.** We understand the Commission's focus on service reliability and are prepared to meet this requirement with a practical and effective strategy. For a trip that originates within our core service areas (Philadelphia or Montgomery County), and terminates at a destination elsewhere in Pennsylvania, our plan is to fulfill this service through a curated network of pre-approved paratransit partners.

This model offers several key advantages:

- **Guaranteed Service Delivery:** It prevents our limited fleet from being unavailable for local trips due to single, long-distance transport, ensuring we always have capacity to serve our primary passenger base.
- **Optimized Resource Allocation:** We can maintain efficient, localized operations while still meeting all intrastate service requests.
- **Seamless Customer Experience:** Our company will remain the single point of contact for the customer. We will handle all scheduling, communication, and quality control, while our vetted partners provide safe and professional transportation.

We are confident that this combination of focused, in-house service and strategic partnerships will allow us to provide reliable and high-quality paratransit for our passengers.

#### **2a.i) Criminal History Check Frequency (Criminal History)**

**Initial Check:** Initial and ongoing criminal history checks are mandatory for all Humane Care Transportation Service LLC drivers. Prior to hiring, Humane Care Transportation Service LLC obtains and reviews a criminal history record from the Pennsylvania State Police via the **Pennsylvania Access To Criminal History (PATCH)** <https://epatch.pa.gov/> and every other state where the applicant has resided for the past 12 months. After the initial check, a criminal history record from the Pennsylvania State Police must be obtained and reviewed for each Humane Care Transportation Service LLC driver every **two years**.

#### **2a.ii) Disqualifying Offenses (Criminal History)**

Humane Care Transportation Service LLC maintains a strict policy on disqualifying offenses to ensure the safety of our passengers. A person is not permitted to operate a vehicle if they have a conviction for a felony or a misdemeanor that "relates adversely" to their suitability to operate a paratransit vehicle. The following crimes outright disqualify drivers at Humane Care Transportation Service LLC. These include:

- **Within the preceding 7 years:**
  - Driving under the influence of drugs or alcohol.
  - A felony conviction involving theft or fraud.

- A felony conviction for a violation of the Controlled Substance, Drug, Device and Cosmetic Act.
- **Within the preceding 10 years:**
  - Use of a motor vehicle to commit a felony.
  - Burglary or robbery.
- **At any time:**
  - A sexual offense.
  - A crime of violence (as defined in 18 Pa. C.S. § 5702).
  - An act of terror.

These are not an exhaustive list, and a general rule is to consider the nature of the crime, how much time has passed, and its relevance to the job of transporting vulnerable people.

### 2a.iii) Record-Keeping Procedures (Criminal History)

At Humane Care Transportation Service LLC, we believe that the secure handling of sensitive information is a core component of our commitment to safety and privacy. To ensure full compliance and data security, we will adhere to the following procedures:

- **Centralized and Secure Storage:** All criminal history records, including the initial and bi-annual checks, will be stored in a centralized, locked, and fireproof filing cabinet at our principal place of business. For digital records, we will use an encrypted, password-protected database with restricted access. These records will be stored separately from standard personnel files to further enhance security.
- **Strict Access Control:** Access to these confidential records will be strictly limited to authorized personnel only, specifically the Human Resources Manager and the designated Safety Officer. All employees will be trained on data privacy protocols to ensure that sensitive information is not shared or mishandled.
- **Record Retention and Disposal:** We will retain a copy of each driver's criminal history record for a minimum of **three years** from the date of the check, as required by law. After the three-year retention period, records will be securely disposed of. Physical documents will be shredded, and digital files will be permanently deleted from our secure servers.
- **Accessibility for Regulatory Review:** While maintaining strict security, our records will be organized and readily accessible for review by the PA PUC upon request.

### 2b.i) Record Keeping – Driver History

At Humane Care Transportation Service LLC, we are committed to maintaining comprehensive driver records to ensure full compliance with 52 Pa. Code § 29.504 - Driver History. Our procedures are designed to guarantee the safety of our passengers and maintain the highest standards of operational integrity.

We will maintain a driver history record for each of our drivers that includes the following essential information:

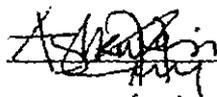
- **Driver Identification:** The driver's full name, current address, and driver's license number.

- **Employment History:** The date of their employment with our company, and if applicable, the date of their separation.
- **Accident Records:** A chronological list of all on-duty accidents involving the driver, noting the date, location, and a brief description of the incident.
- **Violations and Penalties:** A record of any violations of The Vehicle Code (75 Pa.C.S.) or other applicable laws, including any penalties or suspensions imposed.
- **Customer Complaints:** A record of any customer complaints filed against the driver, along with the date and resolution.
- **Training and Certification:** A list of all complete training courses and certifications, including dates.

Proper record retention is a critical part of our safety protocols. We will adhere to the following procedures to ensure all records are secure and readily accessible for regulatory review:

- **Secure Storage:** All driver history records will be stored in a centralized, secure location at our respective office locations. Hard copies will be kept in a locked, fire-resistant cabinet, and digital copies will be stored on an encrypted, password-protected server with restricted access to authorized personnel only.
- **Retention Period:** We will retain each driver's record for a minimum of three years after their separation from the company. Following this period, all records will be securely disposed of to protect personal information.
- **Regulatory Accessibility:** All of our records will be meticulously organized and readily available for inspection by the Pennsylvania Public Utility Commission (PA PUC) upon request, demonstrating our complete transparency and commitment to compliance.

I, Mark Tay 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 to Pa. C.S. § 4904 (relating to unsworn falsification to authorities).




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Yours Sincerely,

DATE OF DEPOSIT

SEP 17 2025

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