

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: Application of Payne Safe Riders LLC
for Paratransit Authority
Docket No. A-2025-3056647

PETITION FOR RECONSIDERATION FROM STAFF ACTION

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code § 5.44, Payne Safe Riders LLC ("Petitioner"), by and through its undersigned owner, respectfully petitions the Commission to reconsider the staff action dated September 5, 2025, denying Petitioner' s application for a Certificate of Public Convenience, and in support thereof states as follows:

1. Payne Safe Riders LLC is a Pennsylvania limited liability company organized to provide safe and reliable school transportation services to K-12 students within Philadelphia County and surrounding areas.
2. On or about July 2025, Petitioner submitted an application for paratransit authority under Docket No. A-2025-3056647.
3. By letter dated September 5, 2025, the Commission denied the application, citing failure to file required information in response to a data request.
4. Petitioner respectfully submits that the denial was due to procedural and technical issues, not substantive noncompliance. Specifically: the required response was initially prepared but inadvertently submitted in multiple PDF files instead of one cohesive document; certain attachments exceeded file size limits for e-filing; and Petitioner misunderstood formatting requirements but has since corrected all deficiencies.
5. Petitioner has now compiled all requested materials in a single, complete, and properly formatted submission, including service description, financial statement and proof of assets, driver qualification system pursuant to Title 52 PA Code, and insurance and vehicle documentation.

Payne Safe Riders LLC

By: Nieema Payne

Nieema Payne, Owner/CEO

1135 W. Cheltenham Ave.

Elkins Park, PA 19027

Phone: (215) 344-4557

Email: info@paynesaferiders.com

Dated: September 7, 2025

APPEAL RIGHTS

If you disagree with this determination, you may send a Petition for Reconsideration from Staff Action (Petition) to: Secretary, PA Public Utility Commission, 400 North Street, Harrisburg, PA 17120. Such a Petition is a written statement asking the Commission to change its determination.

ALL Parties to proceedings pending before the Commission are advised to open and use an e-filing account through the Commission's website, OR you may submit your filing by mail. If a filing contains confidential or proprietary material, the filing is required to be submitted by mail.

The Petition must be filed with the Commission within twenty (20) days of the date of this letter. If no timely request for reconsideration is made, this action will be deemed to be the final action of the Commission.

The Petition MUST include: (1) a written statement (divided into numbered paragraphs) outlining the reasons for the request, (2) the case docket number(s) (they are provided for you at the top right-hand corner of this letter), (3) the name of the person on whose behalf the petition is made, (4) copies of relevant documentation, and (5) a verification with original signature. See 52 Pa. Code §§1.31 and 5.44. Below is a sample Verification:

VERIFICATION

I, (YOUR NAME GOES HERE), hereby state that the facts above set forth are true and correct (or 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).

(SIGN AND DATE)

Neema Payne 9/25/2025

If you believe that you have received this letter in error, please contact the Compliance Office of the Motor Carrier Services in the Bureau of Technical Utility Services at 717-787-3834 within ten (10) days of the date of this letter.

Sincerely,

Matthew L. Homsher

Matthew L. Homsher
Secretary