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November 17, 2025

VIA E-FILING

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

Re: Application of Parsa Ariana LLC
Docket No: A-2025-3057853

Dear Secretary Homsher:

Enclosed for electronic filing please find the Joint Protest of Bucks County Transport, Inc. and Bux-Mont Transportation in the above-captioned proceeding.

Copies are being served in accordance with the attached Certificate of Service. Please contact me with any questions.

Respectfully submitted,



Tanya C. Leshko

TCL/psm

Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Parsa Ariana LLC for :
approval to transport, as a common carrier, :
by motor vehicle, persons, in paratransit : Docket No. A-2025-3057853
service, from points in Bucks County and :
the City and County of Philadelphia, to :
points in Pennsylvania, and return. :

**JOINT PROTEST OF BUCKS COUNTY TRANSPORT, INC. AND
BUX-MONT TRANSPORTATION, INC.**

Bucks County Transport, Inc. (“BCT”) and Bux-Mont Transportation, Inc. (“Bux-Mont”) (collectively, the “Protestants”), by and through their attorneys, hereby file this Protest to the above referenced Application pursuant to 52 Pa. Code §§ 3.381(c), 5.51, and state as follows:

I. INTRODUCTION / PROTESTANTS

1. BCT’s full name and address is:

Bucks County Transport, Inc.
Buckingham Green 2
PO Box 510
Holicong, PA 18928
215-794-5554

- Bux-Mont’s full name and address is:

Bux-Mont Transportation, Inc.
726 Fitzwatertown Rd.
Willow Grove, PA 19090
215-659-8865

- The name, address and telephone number of Protestants’ attorneys are:

Tanya C. Leshko (PA I.D. #78787) (Primary Contact)
John F. Povilaitis (PA I.D. #28944)
Alan Michael Seltzer (PA I.D. #27890)
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The Protestants request that all pleadings, correspondence and other documents in this matter be directed to their attorneys.

II. PROTESTANTS' INTEREST IN THE APPLICATION

2. BCT holds authority from the Pennsylvania Public Utility Commission (“PaPUC” or “Commission”) to transport persons as a common carrier in paratransit service between points in Bucks County and to points in the counties of Northampton, Lehigh, Montgomery and Philadelphia, and return. As a carrier in the paratransit industry operating where Parsa Ariana LLC (“Applicant” or “Parsa”) proposes to offer service, BCT has a substantial interest in ensuring that the public is served by carriers that have sufficient technical expertise, financial capacity and a propensity to operate safely and legally, as required by the Commission. BCT currently holds PaPUC authority and operates under the following authorizations: Docket No. A-00107294, Folder 2, Am-C; Docket No. A-00107294.

3. Bux-Mont holds authority from the PaPUC to transport persons as a common carrier in paratransit service between points in Bucks County and to points in the counties of Montgomery and Philadelphia, and return. As a carrier in the paratransit industry operating where the Applicant proposes to offer service, Bux-Mont has a substantial interest in ensuring that the public is served by carriers that have sufficient technical expertise, financial capacity and a propensity to operate safely and legally, as required by the Commission. Bux-Mont currently holds PaPUC authority and operates under the following authorizations: Docket No. A-00087075, Folders 1, 2, 3, 4, 5, 6; Docket No. A-00087075, Folders 2, 3, 3 Am-A, 4; Docket No. A-00087075, Folders 5/A-2009-2123552, 5 Am-A; Docket No. A-00087075, Folder 6; Docket No. A-00087075, Folder 7.

4. The Applicant has sought Commission authority to provide paratransit service in geographic territories that overlap with geographic areas in which the Protestants currently provide paratransit service. The Applicant has requested authority for a significant service territory in the Commonwealth of Pennsylvania that encompasses Bucks County and the City and County of Philadelphia. As such, the Protestants have a substantial interest in the outcome of this Application proceeding that will not be addressed by any other participant.

III. GROUNDS FOR PROTEST

5. As the proponent of an order seeking the issuance of a certificate of public convenience, the Applicant carries the burden of proof. 66 Pa. C. S. § 332(a). Parsa has not made sufficient and adequate showing that it possesses, or is likely to possess, sufficient technical and financial ability to allow the Commission to find or determine that granting a certificate of public convenience to the Applicant is necessary or proper for the service, accommodation, convenience or safety of the public pursuant to Section 1103(a) of the Public Utility Code. 66 Pa.C.S. § 1103(a). In addition, Parsa has not made sufficient and adequate showing that it is likely to operate safely when providing paratransit service.

6. On the issue of technical fitness, the Applicant has not made sufficient showing that any of its principals or drivers possesses any prior managerial or operating experience in the transportation business. The Applicant has not substantiated when it will add vehicles that are equipped with the medical or handicap devices appropriate to paratransit service.

7. Applicant has not adequately explained as required by the Commission's Application at ¶ 6 of the "Verified Statement of Applicant" how the vehicles it plans to use in the

business are appropriate to provide reasonable and efficient service to the large service territory it proposes to serve.

8. The Applicant has not demonstrated that paratransit services may be provided safely. Two of the vehicles proposed to be used by Applicant are ten (10) and eleven (11) years old, which nearly or does exceed the Commission's ten-year age limit for call or demand service pursuant to 52 Pa. Code § 29.314(c). Although that regulation applies to call or demand service and not specifically to paratransit service, it is a logical guideline for safety since paratransit service is frequently hired by call.

9. The Applicant has failed to provide a sufficient description of its facilities, including a description of its physical location and the facility which will be utilized to house the vehicles, as required by the Commission's Application at ¶4 of the "Verified Statement of Applicant." On the issue of technical fitness, the Applicant has failed to sufficiently describe its plan to maintain records required by the PUC and normal business records. Applicant has not provided a sufficient description of employees, including dispatchers, who will be responsible for the conduct of the business intended to take place throughout portions of Pennsylvania. All of these omissions indicate that Applicant lacks the technical fitness to operate as a common carrier providing paratransit service.

10. Applicant cannot demonstrate that it is likely to operate safely when providing service. The Applicant has not demonstrated that it is sufficiently familiar with Pennsylvania Department of Transportation vehicle equipment inspection standards in order to ensure the Commission that the applicable standards are and will be met at all times when its vehicles are being operated as required by Commission regulations. 52 Pa. Code § 29.402(1). Applicant has provided insufficient information requested in the Commission's "Verified Statement of

Applicant” at ¶7 regarding its vehicle safety program or its system for ensuring its vehicles will continuously comply with applicable Pennsylvania vehicle equipment standards, and insufficient information regarding the premises at which vehicles will be stored.

11. The Applicant has also failed to provide sufficient evidence of financial fitness. There is no indication Applicant is prepared to follow generally accepted accounting principles in its record keeping, as required by the Commission. 52 Pa. Code § 29.41(a). There is no clear indication the business will have sufficient liquidity in the form of a line of credit, sufficient cash or other funding sources available to cover the reasonable and customary costs of operating its proposed service. The adequacy of the identified business assets cannot be evaluated and found sufficient because no business expenses have been estimated. The Applicant has provided no information in the Application indicating it has taken into account normal business expenses, such as the cost of vehicles, vehicle maintenance expense, marking of vehicles or salaries of drivers. Nor has any projection of likely income from the paratransit service business been provided.

12. The Applicant has not demonstrated that it is sufficiently familiar with Pennsylvania Department of Transportation vehicle equipment inspection standards such that it can ensure that standards are met at all times when its vehicles are being operated as required by Commission regulations. 52 Pa. Code § 29.402(1). Nor has Applicant provided an adequate explanation as to how it will ensure that vehicles are safe and properly functioning prior to putting them into service before each trip. Therefore, Parsa has not demonstrated that it will have a propensity to operate safely if authorized to commence its proposed service.

13. The Applicant states it has obtained insurance quotes but does not provide a plan for the purchase of insurance and does not list the insurance expense in its financial statement.

Applicant has not, therefore, demonstrated it can obtain insurance and pay the required premiums.

14. The grounds for Protest are not limited to the above but are by way of example. Protestant reserves the right to supplement the basis for this Protest as information is developed.

WHEREFORE, for all the foregoing reasons, the Protestants respectfully request that they be granted full party status in this proceeding as Protestants, and absent a resolution of this proceeding in the next sixty (60) days, that hearings be scheduled so that the Commission may develop an evidentiary record concerning the issues raised in this Protest, and that the Application of Parsa Ariana LLC be denied.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC




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*Attorneys for Bucks County Transport, Inc. and
Bux-Mont Transportation, Inc.*

Dated: November 17, 2025

VERIFICATION

I, James A. Raymond, certify that I am Chief Financial Officer of Bucks County Transport, Inc., and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that Bucks County Transport, Inc. expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.



James A. Raymond, CFO
Bucks County Transport, Inc.

DATED: 11-17-2025

VERIFICATION

I, R. Samuel Valenza, certify that I am President and Chief Executive Officer of Bux-Mont Transportation, Inc., and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that Bux-Mont Transportation, Inc. expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.



R. Samuel Valenza, President & CEO
Bux-Mont Transportation, Inc.

DATED: 11-17-2025

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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County, and the City and County of :
Philadelphia, to points in Pennsylvania :
and return :

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing document upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email and Regular Mail:

Safiullah Amani
Mohammad Arif Popal
Parsa Ariana LLC
3439 Vista Street
Philadelphia, PA 19136
Safi.amani025@gmail.com

Date: November 17, 2025



Tanya C. Leshko