



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
BUREAU OF INVESTIGATION AND ENFORCEMENT	:	
	:	
V.	:	DOCKET NO. C-2025-3055334
	:	
KNS TRANSPORT LLC	:	
219 MIDDLE ROAD	:	
RICHFIELD, PA 17086	:	

**MOTOR CARRIER COMPLAINT**

The Pennsylvania Public Utility Commission (Commission or “PUC”) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Investigation and Enforcement and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Investigation and Enforcement -Motor Carrier Division hereby represents as follows:

1. That KNS TRANSPORT LLC, Respondent, maintains a principal place of business at 219 Middle Road, Richfield, PA 17086.
2. That on April 17, 2025, by Commission Secretarial Letter, Respondent was issued a certificate of public convenience by this Commission authorizing transportation, as a common carrier, by motor vehicle, property, excluding household goods in use, between points in Pennsylvania. at Application Docket No. A-2025-3053480, PUC Utility Code 8919477.
3. That on or about October 20, 2025, PUC Motor Carrier Enforcement Officer Travis Griffith concurrently conducted a Federal USDOT Safety Audit and a Commission-required Safety Fitness Review (“SFR”) resulting in a failing SFR score due to Respondent’s failure to maintain proof of financial liability insurance on file with the Commission.
4. That on October 28, 2025, Officer Griffith emailed Respondent’s owner, Seth Batdorf, attaching a copy of the Safety Audit and SFR report and provided a 15-day deadline for Respondent to submit proof of financial liability insurance to the Commission. Officer Griffith informed Respondent that if no action was taken, the Commission may file a complaint cancelling the Respondent’s operating authority.
5. That Respondent, by failing to achieve a satisfactory SFR evaluation while certificated by this Commission as a common carrier, violated 66 Pa. C.S. §§501(c),504. The penalty for these violations is cancellation of the certificate held by Respondent with this Commission at PUC Utility Code 8919477.

**WHEREFORE**, the Bureau of Investigation and Enforcement hereby requests that the Commission revoke the certificate of public convenience issued to KNS TRANSPORT LLC, at PUC Utility Code 8919477.

Respectfully submitted,



Brian B. Mehus, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement  
400 North Street 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**VERIFICATION**

I, Brian B. Mehus, 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 that the Bureau will be able to prove the same at any 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.

Date: 5 December 2025



Brian B. Mehus, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement