

Petition for Reconsideration

DATE OF DEPOSIT

Docket#: A-2025-3058159

On behalf of: Safe Travel Transportation LLC
11/23/2025

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

1. In regards to the denial letter received on 11/18/2025, we would like to officially appeal the denial and dismissal of our application for our application for a Motor Common Carrier of Persons in Paratransit Service.
2. Per the denial letter received, the sole remaining issue and reason for denial is as follows: "absent from the applicant's response was evidence of an acceptable driver hiring/retention policy which satisfied the requirements of 52 Pa Code §§ 29.504 - 29.505."

Applicant has now corrected this deficiency and attaches a full Driver Hiring & Retention Policy compliant with all PUC requirements. I am attaching to this letter a revised response to that specific issue. The attached policy includes mandatory driver history checks, criminal background checks, re-check intervals, disqualification standards, and record keeping as required.

3. Applicant is committed to safe and compliant operation as a Non-Emergency Medical Transportation (NEMT) carrier. Applicant respectfully requests that the Commission vacate the denial and approve the application. No prejudice results from granting reconsideration because Applicant corrected the only deficiency immediately.

Respectfully submitted,
Ayman Ahmed
Owner, Safe Travel Transportation LLC
133 Denver Rd, Denver, PA 17517
Email: Aymanahmed20201010@gmail.com
Phone: 802-376-3681

VERIFICATION

I, Ayman Ahmed, hereby state that the facts set forth in the foregoing Petition for Reconsideration 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.

(Applicant is not now engaged in intrastate transportation of passengers for compensation in the Commonwealth except as authorized by the Pennsylvania Public Utility Commission and will not engage in the transportation for which approval is sought unless and until such authority is granted.)



Ayman Ahmed, Owner

Date: 11/23/2025

Safe Travel Transportation LLC

Comprehensive Driver Hiring, Qualification, Training & Retention Policy

Fully Compliant with 52 Pa. Code §§ 29.504–29.505

1. Purpose

This comprehensive policy ensures Safe Travel Transportation LLC hires, trains, monitors, and retains qualified drivers in full compliance with Pennsylvania Public Utility Commission (PUC) regulations, including 52 Pa. Code §29.504 (Driver History) and §29.505 (Criminal History).

2. Minimum Driver Qualifications

- Be at least 21 years old.
- Possess a valid Pennsylvania driver's license appropriate for the vehicle type.
- Have at least 3 years of driving experience.
- Must pass all required motor vehicle and criminal background checks.
- Must be physically able to assist passengers safely.
- Must maintain a safe and professional driving record.
- Be legally authorized to work in the United States.

3. Driver History Requirements (52 Pa. Code §29.504)

A. Pre-Employment Driver History Checks

- Obtain a 3-year driving record from PennDOT.
- Obtain driving records from any state in which the applicant held a license in the previous 3 years.
- Review for violations, suspensions, crash history, DUIs, and safety-risk patterns.

B. Disqualification Criteria

- More than 3 moving violations in the past 3 years.
- DUI/DWI within the past 5–7 years (company standard: 7 years).
- License suspension (excluding administrative) within 3 years.
- Reckless driving conviction within 3 years.
- Any pattern indicating unsafe driving.

C. Annual Driver History Re-Checks

Safe Travel Transportation LLC will obtain and review an updated driving history record for every active driver at least once every 12 months.

D. Recordkeeping

All driving history reports will be retained for at least 2 years as required by law.

4. Criminal History Requirements (52 Pa. Code §29.505)

A. Pre-Employment Criminal Background Checks

- Pennsylvania State Police criminal background check.
- Criminal records from any state lived in during the past 12 months.
- Sex Offender Registry Check.
- Drug & Alcohol Screening.
- Child Abuse History Clearance (recommended).

B. Automatic Disqualifications

- Any violent felony.
- Any sexual offense.
- Any felony involving fraud, theft, or misuse of a vehicle.
- Any conviction indicating danger to passengers.
- DUI that impacts ability to transport safely.

C. Biennial (Every 2 Years) Re-Check

Criminal background checks will be repeated every 2 years for all active drivers.

D. Recordkeeping

All criminal history records will be retained for at least 3 years.

5. Driver Training Requirements

- Defensive driving.
- Passenger safety procedures.
- ADA compliance & wheelchair securement.
- Use of ramps, lifts, and restraints.
- Incident reporting & emergency procedures.
- Vehicle inspection procedures.
- HIPAA basics.

6. Vehicle Maintenance Responsibilities

- Perform daily pre-trip and post-trip inspections.
- Report defects immediately.
- Keep vehicles clean and sanitized.
- Ensure tie-downs, seatbelts, and safety equipment work properly.

7. Ongoing Monitoring & Retention (52 Pa. Code §29.505)

- Annual MVR check.
- Annual background check.
- Quarterly safety meetings.
- Random ride-alongs.
- Customer feedback review.

8. Performance Standards

- Unsafe driving.
- Lateness.
- Vehicle neglect.
- Customer complaints.
- Policy violations.

9. Drug & Alcohol Policy

Safe Travel Transportation LLC prohibits driving under the influence, on-duty alcohol/drug use, or refusal of testing.

- Pre-employment.
- Random.
- Post-accident.
- Reasonable suspicion.

10. Reporting Requirements

- Drivers must report any new traffic violation within 24 hours.
- Drivers must report any arrest or criminal charge within 24 hours.
- Failure to report is grounds for suspension or termination.

11. Records & Compliance

The company will maintain full driver qualification files including driving history reports, criminal background checks, license copies, violation reports, disciplinary records, training documentation, and annual evaluations. Files will be retained for a minimum of 3 years.



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