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December 29, 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 Ark Life Services Limited Liability Company
Docket No: A-2025-3058581

Dear Secretary Homsher:

Enclosed for electronic filing please find the Joint Protest of Bux-Mont Transportation., Easton Coach Company, Suburban Transit Network, Inc. and Tri County Transit Service, Inc. 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 Ark Life Services Limited :
Liability Company to transport, as a common :
carrier, by motor vehicle, persons in : Docket No. A-2025-3058581
paratransit service from points in :
Montgomery County, to points in :
Pennsylvania and return. :

**JOINT PROTEST OF BUX-MONT TRANSPORTATION, INC., EASTON COACH
COMPANY, SUBURBAN TRANSIT NETWORK, INC., AND TRI COUNTY TRANSIT
SERVICE, INC.**

Bux-Mont Transportation, Inc. (“Bux-Mont”), Easton Coach Company (“Easton”),
Suburban Transit Network, Inc. (“TransNet”), and Tri County Transit Service, Inc. (“Tri County”)
(collectively, the “Joint Protestants”), by and through their attorneys, hereby file this Joint Protest
to the above referenced Application pursuant to 52 Pa. Code §§ 3.381(c), 5.51, and state as
follows:

I. INTRODUCTION / PROTESTANTS

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

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

- Easton’s full name and address is:

Easton Coach Company
1200 Conroy Place
Easton, PA 18040
610-252-8667

TransNet's full name and address is:

Suburban Transit Network, Inc.
Union Meeting Corporate Center
980 Harvest Drive, Suite 100
Blue Bell, PA 19422
215-542-7433

Tri County's full name and address is:

Tri County Transit Service, Inc.
110 Industrial Parkway
Sanatoga, PA 19464
610-495-5640

The name, address and telephone number of Joint 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 Joint Protestants request that all pleadings, correspondence and other documents in this matter be directed to their attorneys.

II. JOINT PROTESTANTS' INTEREST IN THE APPLICATION

2. Bux-Mont 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 Montgomery and Philadelphia, and return. As a carrier in the paratransit industry operating where Ark Life Services Limited Liability Company ("Applicant" or "Ark Life") 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 and applicable law. 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.

3. Easton holds authority from the PaPUC to transport persons as a common carrier in paratransit service between points in the borough of Norristown, Montgomery County, between points in the borough of Norristown and within an airline distance of five (5) miles of the limits of the Borough of Norristown, and in the township of Whitemarsh, Montgomery County. As a carrier in the paratransit industry operating where the Applicant proposes to offer service, Easton 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 and applicable law. Easton currently holds PaPUC paratransit authority and operates under the following authorizations: Docket No. A-00118835/A-2014-2415540.

4. TransNet holds authority from the PaPUC to transport persons as a common carrier in paratransit service between points in Montgomery County and from points in Montgomery County to points in the counties of Chester, Delaware, Philadelphia and Bucks and return. As a carrier in the paratransit industry operating where the Applicant proposes to offer service, TransNet 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. TransNet currently holds PaPUC authority and operates under the following authorizations: Docket No. A-00102219, F.2; Docket No. A-00102219, F.1, Am-A.

5. Tri County holds authority from the PaPUC to transport persons as a common

carrier in paratransit service between points in the borough of Pottstown, Montgomery County, and within an airline distance of fifteen (15) miles of the limits of the Borough of Pottstown. As a carrier in the paratransit industry operating where the Applicant proposes to offer service, Tri County 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 and applicable law. Tri County currently holds PaPUC authority and operates under the following authorizations: Docket No. A-00112826, F.2.

6. The Applicant has sought Commission authority to provide paratransit service in geographic territories that overlap with geographic areas in which the Joint Protestants currently provide paratransit service. The Applicant has requested authority in a large portion of southeastern Pennsylvania by proposing to transport in paratransit service, from all points located in the County of Montgomery. As such, the Joint 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

7. Applicant has not made a 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).

8. Applicant has failed to provide a sufficient description of its facilities, including a description of 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." The Application indicates a need to invest in setting up an office, which fails to address whether the current

infrastructure supports confidential recordkeeping and appropriate dispatch services.

9. The Commission's Policy Statement on the evidentiary criteria used to decide motor carrier applications states that Applicant has the burden to demonstrate compliance with fitness standards, including "[w]hether an applicant has sufficient capital, equipment, facilities and other resources necessary *to serve the territory requested.*" (emphasis added) 52 Pa. Code § 41.14(1).

10. Applicant possesses one vehicle, which is currently utilized to provide service to a substantial service territory. Applicant states that an additional vehicle will be purchased when trip volume increases, but does not address how a single vehicle is appropriate to serve a three-county area.

11. The Application states that Applicant has received a "disproportionate" number of requests from Montgomery County in comparison to requests originating from Philadelphia and Delaware Counties. Applicant does not explain what "disproportionate" means, whether Applicant can currently service the requests received from within its service territory, how many additional trips might be generated from the additional territory, whether Applicant has the resources to staff and support those requests for service, and whether those would account for increased business such that Applicant can finance the proposed additional vehicle presumably intended to provide service to the additional territory.

12. Applicant has failed to provide sufficient evidence of financial fitness. Applicant has not provided adequate details in connection with its financial position. 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). Applicant has not provided a complete financial statement. There is no 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 expanding its proposed service.

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

WHEREFORE, for all the foregoing reasons, the Joint 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 Joint Protest, and that the Application of Ark Life Services Limited Liability Company be denied.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC



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*Attorneys for Bux-Mont Transportation, Inc.,
Easton Coach Company, Suburban Transit
Network, Inc. and Tri County Transit Service, Inc.*

Dated: December 29, 2025

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Counties of Delaware and Montgomery 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:

Rosemary Oluwo
Idowu Yeku
Ark Life Services Limited Liability Company
Two Bala Plaza, Suite 300-556
Bala Cynwyd, PA 19004
info@arklifeservicespa.com

Date: December 29, 2025



Tanya C. Leshko