

Application for Motor Common Carrier of Persons in Paratransit Service

THIS APPLICATION IS TO BE USED FOR COMMON CARRIER PASSENGER SERVICE WHEN PROVIDING TRANSPORTATION ON A NONEXCLUSIVE, ADVANCE RESERVATION BASIS.

1. **Legal Name of Applicant** (Individual, Partnership or Corporation)

Shuttlebee Shuttles, Inc.

- If you are an individual who has not formed any type of corporate entity, you should enter your name **as it will appear on your insurance documents**.
- If you are filing for a partnership, but **not a limited liability partnership**, the names of all partners must be entered on this line. Those names should be entered **as they will appear on your insurance documents**. This includes husbands and wives filing jointly.
- If you are filing for a corporate entity (corporation, limited liability company, or limited liability partnership), **even if you are the sole shareholder member**, you must enter the name **exactly as it appears on the registration papers from the Corporation Bureau of the Pennsylvania Department of State**.

2. **Trade Name** (Attach a copy of fictitious name registration if applicable)

This is any name which you will be operating under which differs from the **LEGAL NAME OF APPLICANT**. A **TRADE NAME** is considered a **FICTITIOUS NAME** if the identity of the applicant cannot be readily determined. *EXAMPLE: John Doe is the applicant and wants to use the name "Johnboy Vans" as his trade name. People cannot readily determine that John Doe is the actual operator; therefore, the name is fictitious and must be registered as such. Trade names such as "John Doe Vans" or "J. Doe Vans" are not considered fictitious and would not have to be registered.*

3. **Do you currently hold PUC Authority?** NO **Previous Authority?** NO

If YES, at PUC No. A- _____

4. **Are you a business entity registered with the PA Dept. of State?** NO
If NO, you must register (see checklist on how to register)

If YES, provide your PA Corporation Bureau Entity ID Number 0015226589
(See checklist and indicate type of business entity registered)

5. **If either a corporation or limited liability company, please list members (LLC) or shareholders and officers (corporation).**

Kristina Fahl, CEO _____

6. **Mailing Address**

PO Box 435
Street Address
Waynesville, NC 28786 Buncombe
City, State and Zip Code County
(888) 641-9843 kristina@getshuttlebee.com
Telephone Number E-mail Address

This is the e-mail address to which the Commission will send all official documents issued by the Commission until further notice.

7. **Physical Address** (If different than mailing address. Do not use a post office box.)

45 S French Broad AVE #170
Street Address
Asheville, NC 28801 Buncombe
City, State and Zip Code County
(888) 641-9843 kristina@getshuttlebee.com
Telephone Number E-mail Address

The address entered here should reflect the actual location of the business. This is the address the Commission needs in order to dispatch Enforcement Officers to inspect equipment. If left blank, it will be assumed that the **PHYSICAL ADDRESS** is the same as the **MAILING ADDRESS**

8. **Attorney** (if applicable)

Attorney's Name & Telephone Number for this Filing

Attorney's Address E-mail Address

An attorney's name should only be entered if an attorney is filing the application for a client and the application is being sent under the attorney's cover letter.

9. **Does applicant have a USDOT Number?**

No Yes, at No. _____

10. Describe the service area proposed by this application.
(Use the space below or attach additional sheet if space provided is not sufficient).

To transport persons, by motor vehicle, in Paratransit service, between any county in Pennsylvania, from points primarily in Philadelphia County, Lehigh County and Allegheny County and adjacent counties and return.

Examples:

- *To transport people whose personal convictions prevent them from owning or operating motor vehicles from points in Lancaster County to points in PA, and return.*
- *To transport people from the city and county of Philadelphia to correctional facilities in PA, and return.*
- *To transport people in wheelchair and stretcher vans from points in the city of Pittsburgh to points in Allegheny County, and return.*
- *To transport people between points in Northumberland County.*

11. Certification:

Applicant certifies that it is not now engaged in unauthorized intrastate transportation for compensation between points in Pennsylvania and will not engage in said transportation unless and until authorization is received from the Pennsylvania Public Utility Commission.

Applicant further certifies that it understands the requirements of the Pennsylvania Public Utility Commission, especially as they relate to safety and insurance and that it may be subject to civil penalties, suspension or cancellation of the Certificate for failure to comply with Commission requirements.

Applicant further certifies that it understands that it is subject to an annual assessment based upon its reported gross Pennsylvania intrastate revenues; said assessment to help defray expenses incurred in regulating Motor Common Carriers of Persons in Paratransit Service; and acknowledges that failure to report revenue and pay its annual assessment may result in civil penalties, suspension or cancellation of the certificate.

Verification of Application

I/We hereby state that the statement(s) made in this application is/are true and correct to the best of my/our knowledge and belief.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Kristina Fahl

(Print Name)

Kristina Fahl

(Signature)

February 24, 2026

(Date)

The verification of the application must be completed by the applicant appearing on Line 1 of the application by the named individual, all partners if a partnership, a member (if a limited liability company), or by the President or Secretary (if a corporation).

VERIFIED STATEMENT OF APPLICANT

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THE APPLICANT'S FITNESS TO OPERATE. STATEMENTS SHOULD BE TYPED OR PRINTED. ILLEGIBLE STATEMENTS WILL DELAY YOUR APPLICATION.

Shuttlebee Shuttles, Inc

Legal Name of Applicant

Trade Name, if any

45 S French Broad Ave #170	Asheville	NC	28801
Street Address (principal place of business)	City or Municipality	State	Zip Code

The Verified Statement of the Applicant factual details about your proposed transportation service. Your Verified Statement must answer all of the items listed below and on the following pages. Provide as much information as possible to prevent delay in processing your application. If you need more space to provide your answer, please attach additional pages identifying the appropriate item number.

1. Identify the person making the Verified Statement on behalf of the applicant. If an employee/officer of applicant is making the statement, give name, title, business address and telephone number.

Kristina Fahl, CEO, Shuttlebee Shuttles, Inc.
45 S French Broad Ave STE 170 Asheville, NC 28801 (888) 641-9843

2. List the applicant's affiliation (owner, manager, controls) with any other carrier, with the description of affiliation.

Shuttlebee Shuttles, Inc is a subsidiary of Shuttlebee Solutions Holding, Inc. Shuttlebee Dispatch Solutions Inc. (affiliate) operates a student transportation dispatch platform and holds a Broker of Persons License A-6028149.

3. Describe the applicant's business experience, particularly any experience relating to the operation of a transportation service. If practical experience is lacking, please provide an explanation and description of any education or training that you believe may be relevant.

Please see the additional document included at the end of this application.

4. Describe your facilities, record maintenance plan and your communication network. Please include a description of your physical location, to including office machines that will be utilized, and the facility to house vehicles. As a carrier of household goods in use, applicant should include a description of storage facilities, if applicable. Please include an explanation of your plan to maintain records required by the PUC, as well as normal business records. In regard to your communication network, please explain how you will receive customer requests for transportation, how you will dispatch the vehicles to fulfill the request, and how you will maintain continuous communication with your drivers.

Please see the additional document included at the end of this application.

5. Please state the number of drivers you intend to use or hire in your business and explain why that number of drivers is appropriate for the size of the territory you will be serving. In addition, please explain:
 - a. Your hiring standards for drivers;
 - b. Your system for conducting criminal background checks;
 - c. Your driver training program;
 - d. Your system for conducting driver license checks;
 - e. Your policies regarding alcohol and drug use by your drivers.

Please see the additional document included at the end of this application.

6. Please state the number of vehicles you plan to use in your business and why that number is appropriate to provide reasonable and efficient service to the territory you will be serving. If you have already obtained vehicles for your business, please list them in the chart below.

<u>YEAR</u>	<u>MAKE</u>	<u>MODEL</u>	<u>SEATING CAPACITY*</u>	<u>VEHICLE ID #</u>	<u>MILEAGE</u>

*Vehicles with seating capacity of more than 15 passengers, including driver, can't be used in paratransit service.

7. Describe your vehicle safety program. Please include the following in your explanation:
 - a. Your periodic vehicle maintenance plan
 - b. Your system for ensuring your vehicles will continuously comply with applicable Pennsylvania vehicle equipment standards (67 Pa. Code, Chapter 175).

Please see the additional document included at the end of this application.

8. Please explain what steps you have taken to determine if you can obtain insurance and pay the required insurance premiums.

Please see the additional document included at the end of this application.

9. State whether the applicant has been convicted of a misdemeanor or felony. If applicant is partnership, limited liability partnership, corporation, or limited liability company this question applies to all members, officers, and/or shareholders. If "YES", explain.

_____ YES NO

10. Financial Data. Complete the "Statement of Financial Position", which follows this page. Please feel free to also provide additional information explaining why you believe you have sufficient funds to ensure your transportation business can provide reliable service to the public in a safe manner.

Verification of Statement

The undersigned deposes and says that he/she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his/her knowledge, information, and belief. The undersigned understands that false statements herein are made subject to penalties of 18 Pa. C. S. Section 4904 relating to unsworn falsification to authorities.

Kristina Fahl
 (Signature)

February 24, 2026
 (Date)

Kristina Fahl
 (Name and Title, printed or typed)

Statement of Financial Position (Balance Sheet)
As of (date) February 24, 2026
(Must be less than 6 months old)

ASSETS

Current Assets		
Cash	\$50,000	
Other Current Assets (specify)	_____	
Total Current Assets		\$50,000
Tangible Assets		
Motor Vehicle Equipment	_____	
Property (buildings, land, etc.)	_____	
Office Equipment	_____	
TOTAL ASSETS		\$50,000

LIABILITIES

Current Liabilities (Due within one year of date)		
Loans	_____	
Credit cards/revolving credit	_____	
Other Liabilities (Attach schedule)	_____	
Total Current Liabilities		\$0
Long Term Liabilities (Due after one year of date)		
Mortgage	_____	
Long term commercial loan	_____	
Other Liabilities (Attach Schedule)	_____	
Total Long-Term Liabilities		_____
TOTAL LIABILITIES		\$0

Verified Statement of Applicant

The following information is required by the Commission to determine the applicant's fitness to operate.

Statements should be typed or printed.

Legal Name of Applicant: Shuttlebee Shuttles, Inc.	
Trade Name, if any	
Street Address (principal place of business) 45 S French Broad Ave # 170	City, State, Zip Code Asheville, NC 28801

3. Describe the applicant's business experience, particularly any experience relating to transportation service.

If practical experience is lacking, describe any relevant education or training.

The applicant, Shuttlebee Shuttles, Inc. was founded by its CEO, who brings over five years of hands-on experience owning and operating a student transportation company. This included driving routes beginning at 5:00 AM, managing driver teams, maintaining vehicle fleets, and ensuring compliance with state and federal transportation safety regulations. The company received industry recognition during its years of operation.

Following this, the founder served as Head of Operations at Bus.com, a technology-enabled transportation marketplace, where she was responsible for scaling operator networks across multiple markets. This role provided direct experience in operator onboarding, quality assurance, route optimization, and technology-driven fleet coordination at scale.

The company has also completed the Goldman Sachs 10,000 Small Businesses program, the RevTech Labs accelerator, and was selected as an NC IDEA Micro Grant recipient. Shuttlebee is seeking to operate 6-9 student service providing nonexclusive, advance-reservation transportation for K-12 families in communities without school bus coverage. The company is now seeking to expand its proven operational model into Pennsylvania.

4. Describe your facilities, record maintenance plan, and communication network.

Include: physical location, office equipment, vehicle storage, record-keeping plan, how you receive customer requests, dispatch vehicles, and maintain driver communication.

Physical Location & Office Equipment: Shuttlebee Shuttles, Inc. maintains its principal place of business in Asheville, North Carolina, equipped with computers, internet access, and cloud-based software systems necessary for daily operations, dispatching, and record keeping. The company operates a remote-capable technology infrastructure, allowing real-time oversight of operations across multiple service territories. Upon receiving authority to operate in Pennsylvania, the applicant will establish a local operational presence in the Philadelphia metropolitan area, including a designated physical address for vehicle inspections and correspondence with the Commission.

Vehicle Storage: Vehicles utilized in the applicant's Pennsylvania operations will be stored at secure, designated locations within the service territory. The applicant's operational model partners with independent owner-operators who maintain their own vehicles at their personal facilities. All vehicle storage locations will be made available to Commission Enforcement Officers upon request.

Record Maintenance Plan: The applicant maintains all business and operational records using a proprietary cloud-based platform built on Google Firebase. This system stores driver records, vehicle inspection reports, trip logs, customer communications, training completion records, insurance documentation, and financial records. All records required by the Commission — including driver qualification files, vehicle maintenance logs, and trip manifests — will be retained for the periods prescribed by applicable regulations and made available for inspection upon request. Records are backed up continuously through cloud infrastructure, ensuring protection against data loss.

Communication Network — Receiving Customer Requests: The applicant receives transportation requests through multiple channels, including its website (getshuttlebee.com), a dedicated parent communication portal, telephone, and email. All reservation requests are logged in the company's dispatch management system, which tracks booking details, passenger information, pickup and drop-off locations, and scheduled service times.

Dispatching Vehicles: The applicant utilizes a proprietary route management and operator dispatch portal to assign trips to qualified drivers based on availability, proximity, and route efficiency. Dispatching is managed centrally and confirmed with operators in advance of each scheduled trip, consistent with the nonexclusive, advance-reservation nature of the service.

Maintaining Communication with Drivers: The applicant maintains continuous communication with drivers through a combination of its operator portal, mobile telephone, and text messaging. Drivers are required to confirm trip acceptance, report trip status updates (en route, passenger picked up, trip completed), and immediately communicate any safety incidents or service disruptions. Telematics systems installed in vehicles provide real-time location tracking and driving behavior data as part of the company's "predict and prevent" safety model.

5. Number of drivers and hiring practices.

State the number of drivers you intend to use and explain why that number is appropriate. Also explain:

- a. Hiring standards for drivers
- b. System for conducting criminal background checks
- c. Driver training program
- d. System for conducting driver license checks
- e. Policies regarding alcohol and drug use by drivers

Shuttlebee Shuttles, Inc. has designed its driver qualification, screening, and safety

management practices to meet and exceed the standards outlined in the Pennsylvania Public Utility Commission's Safety Fitness Review Program (52 Pa. Code, Chapter 37) and the adopted Federal Motor Carrier Safety Regulations (49 CFR Parts 382, 390–396). Because Shuttlebee's core mission is transporting school-age children, the company has made a deliberate decision to hold its operations to a higher standard than what the Commission's baseline regulations require — particularly in areas where the nature of the passengers served demands additional safeguards.

The following practices specifically exceed the code and procedures evaluated during the Safety Fitness Review:

5. Number of drivers and hiring practices.

Shuttlebee Shuttles, Inc. has designed its driver qualification, screening, and safety management practices to meet and exceed the standards outlined in the Pennsylvania Public Utility Commission's Safety Fitness Review Program (52 Pa. Code, Chapter 37) and the adopted Federal Motor Carrier Safety Regulations (49 CFR Parts 382, 390–396). Because Shuttlebee's core mission is transporting school-age children, the company holds its operations to a higher standard than the Commission's baseline regulations require — particularly in areas

where the nature of the passengers served demands additional safeguards. Notably, Shuttlebee's fleet consists entirely of minivans and passenger vans that fall within the lightweight vehicle classification (GVWR of 10,000 lbs. or less), which exempts the company from several FMCSR requirements including controlled substance and alcohol testing under Part 382. Shuttlebee voluntarily opts into these requirements in full, and layers additional child-specific safeguards on top of the Commission's baseline, as detailed below.

Number of Drivers: The applicant intends to initially engage 3 to 5 qualified drivers to serve the Philadelphia metropolitan area. This number is appropriate for the initial scope of the proposed service territory, which will focus on advance-reservation transportation for K-12 families. The applicant's model utilizes independent owner-operators who drive their own vehicles, allowing the company to scale its driver count in direct proportion to customer demand without compromising service quality or safety oversight. As ridership grows, additional drivers will be onboarded through the same rigorous qualification process described below.

a. Hiring standards for drivers. The Commission requires motor carriers to maintain driver qualification files containing an application for employment, inquiry to previous employers covering three years, inquiry to state agencies covering three years, an annual review of driving record, annual driver certification of violations, a road test certificate or equivalent, a medical examiner's certificate, and inquiry of positive alcohol or controlled substance results from prior employers (Part 391). Shuttlebee meets all of these requirements and imposes the following additional standards. All drivers must:

- Be at least 26 years of age.

- Hold a valid driver's license appropriate for the vehicle being operated, with a clean driving record for a minimum of three years.
- Have no more than two moving violations in the preceding three years and no DUI/DWI convictions.
- Pass a comprehensive criminal background check (described below in section b).
- Pass a pre-service drug and alcohol screening (described below in section e), despite this not being required for lightweight vehicle operators under Part 382.
- Successfully complete the applicant's proprietary training program, Shuttlebee University (described below in section c).
- Maintain a valid, current medical examiner's certificate if required by applicable federal or state regulations.
- Demonstrate a professional disposition and commitment to child safety, as evaluated during the applicant's onboarding interview process.

The company also maintains a Designated Employer Representative authorized to receive test results and make required decisions in the testing and evaluation process, despite this role not being required for carriers exempt from Part 382 testing.

b. System for conducting criminal background checks. The Part 391 driver qualification file requirements call for inquiries to previous employers and state agencies. Shuttlebee meets these requirements and goes substantially further. All prospective drivers are required to undergo:

- A multi-state criminal records search.
- A national sex offender registry check.
- A Social Security number trace.
- A Pennsylvania State Police criminal background check (SP4-164).
- A Pennsylvania Child Abuse History Clearance (CY-113).

The Pennsylvania State Police and Child Abuse clearances are not required by the Commission for paratransit carriers, but Shuttlebee mandates both given that its

service transports minor passengers. This scope of screening extends well beyond the single-state motor vehicle and employer inquiries required by Part 391. Any conviction for a violent felony, sexual offense, offense involving a minor, or drug trafficking offense results in automatic and permanent disqualification. Background checks are refreshed on an annual basis for all active drivers.

c. Driver training program. Part 391 requires a road test certificate or equivalent as a condition of driver qualification. Shuttlebee exceeds this requirement through its proprietary training program, Shuttlebee University, which all drivers must complete prior to transporting any passengers. The curriculum includes:

- Safe vehicle operation and defensive driving techniques.
- Passenger safety protocols, including proper child passenger loading and unloading procedures.
- Emergency response and incident reporting procedures.
- Customer service standards and parent communication expectations.
- Proficiency with the applicant's technology platform, including the operator portal, route management system, and trip status reporting.
- Applicable Pennsylvania regulations governing motor common carriers of persons in paratransit service, including vehicle equipment standards under 67 Pa. Code, Chapter 175.
- Written policies regarding prohibited use of alcohol and controlled substances, speed compliance, and passenger transportation protocols, distributed and acknowledged in writing during onboarding as required by Part 390.
- Anti-harassment and professional conduct policies.

Drivers must demonstrate competency through a skills assessment upon completion of training. This structured, documented training program provides competency assessment across multiple safety and operational domains — exceeding the road test certificate or equivalent contemplated by Part 391. Ongoing refresher training is conducted periodically, and additional training is required following any safety incident or service complaint.

d. System for conducting driver license checks. The Commission requires an annual review of each driver's driving record and annual driver certification of violations as part of the Part 391 driver qualification file. Shuttlebee meets these requirements and supplements them with additional safeguards. The applicant verifies each prospective driver's license status and driving history through a motor vehicle records (MVR) check prior to approval. MVR checks are conducted at least annually thereafter for all active drivers. Drivers are required to immediately report any license suspension, revocation, traffic citation, or accident to the applicant. Any driver whose license is suspended or revoked is immediately removed from service.

Beyond the reactive compliance framework of Part 392 (Driving of Motor Vehicles), Shuttlebee monitors driver behavior in real time through onboard telematics systems. These systems track speed, hard braking, rapid acceleration, and route adherence as part of the company's proprietary "predict and prevent" safety model. This approach identifies and corrects unsafe driving patterns before they result in incidents — rather than relying solely on the prohibitions against driving while ill, fatigued, or impaired and post-incident enforcement contemplated by Part 392.

e. Policies regarding alcohol and drug use by drivers. As noted above, the Commission's Safety Fitness compliance requirements exempt lightweight vehicle operators (GVWR of 10,000 lbs. or less) from the controlled substance and alcohol testing requirements of Part 382. Shuttlebee's fleet falls within this exemption. However, the applicant voluntarily requires all drivers to undergo the full scope of Part 382 testing protocols, including:

- Pre-service drug and alcohol screening prior to approval (per 382.301).
- Post-accident testing as soon as practicable following any accident (per 382.303).
- Reasonable-suspicion testing based on specific, contemporaneous, articulable observations by a trained supervisor (per 382.307).
- Zero-tolerance removal: any driver who tests positive or refuses to submit to testing is immediately removed from service and permanently disqualified from operating under the applicant's authority.

The applicant maintains this policy because it transports minors and believes that any driver entrusted with the safety of children should be held to the highest standard of sobriety and fitness, regardless of vehicle weight class. Drivers are prohibited from operating any vehicle under the applicant's authority while under the influence of alcohol, illegal drugs, or any medication that impairs the ability to safely operate a motor vehicle. Written policies regarding prohibited use of alcohol and controlled substances are distributed to all drivers during the Shuttlebee University onboarding process and acknowledged in writing, in conformance with Part 390 general requirements and the educational materials provisions of 49 CFR 382.601. All alcohol and controlled substance testing records will be retained in accordance with Part 382 record retention requirements — five years for positive results, refusals, and evaluations; two years for collection process records; one year for negative results — and maintained in a secure, cloud-based system with limited access, available for inspection by a Commission Enforcement Officer within two business days of request.

6. Number of vehicles and vehicle list.

State the number of vehicles you plan to use and why that number is appropriate. If you already have vehicles, list them below.

The applicant plans to initially deploy 1 to 3 vehicles in the proposed service territory, consistent with the 3 to 5 drivers described in Question 5.

All vehicles operated under the applicant's authority will be vehicles with a manufactured rated seating capacity of 9 passengers or fewer (excluding driver) permitted for paratransit service.

Note: The applicant will supplement this table with specific vehicle information as owner operators are onboarded and their vehicles complete the applicant's inspection and approval process. All vehicle information will be made available to Commission Enforcement Officers upon request and prior to the Safety Fitness Review.

7. Describe your vehicle safety program.

Include: a) periodic vehicle maintenance plan; b) system for ensuring vehicles continuously comply with PA vehicle equipment standards (67 Pa. Code, Chapter 175).

Shuttlebee's vehicle safety program is designed to meet and exceed the vehicle inspection, repair, and maintenance requirements of Part 396 of the Federal Motor Carrier Safety Regulations as adopted by the Commission at Chapter 37 of 52 Pa. Code, and to ensure continuous compliance with the Commonwealth's Vehicle Equipment and Inspection Standards (67 Pa. Code, Chapter 175). Because the applicant's fleet consists entirely of lightweight vehicles (GVWR of 10,000 lbs. or less), compliance with Chapter 175 rather than the Parts and Accessories requirements of Part 393 is the applicable equipment standard. The applicant treats both standards as the floor — not the ceiling — of its vehicle safety program, and layers additional technology-driven monitoring and preventive maintenance requirements on top of the regulatory baseline.

a. Periodic vehicle maintenance plan.

The applicant's vehicle maintenance program consists of four integrated tiers:

Tier 1 — Daily Driver Inspections. All operators are required to complete a pre-trip and post-trip vehicle inspection for every day of service using the applicant's operator portal. Pre-trip inspections must be completed and logged before the first passenger pickup of the day. Post-trip inspections must be completed and logged at the conclusion of the final trip. The inspection checklist covers all safety-critical systems including tires and tire pressure, brakes, lights and turn signals, mirrors, windshield wipers and washer fluid, horn, seat belts, child safety locks, interior cleanliness, and any visible fluid leaks or damage. Any defect or deficiency identified during inspection must be reported immediately through the operator portal, and the vehicle must be removed from service until the defect is corrected and the correction is documented. Consistent with Part 396, driver inspection reports are retained for a minimum of 90 days, though the applicant's cloud-based recordkeeping system retains all inspection data indefinitely.

Tier 2 — Scheduled Preventive Maintenance. All vehicles operating under the applicant's authority must adhere to a scheduled preventive maintenance program based on manufacturer-recommended service intervals or every 5,000 miles, whichever comes first. Scheduled maintenance includes oil and filter changes, brake inspection and service, tire rotation and replacement, fluid level checks and replenishment, battery and charging system inspection, belt and hose inspection, suspension and steering component inspection, and HVAC system verification. Operators are responsible for performing scheduled maintenance at qualified

service facilities and must submit dated service receipts and maintenance records to the applicant through the operator portal. The applicant tracks maintenance due dates and mileage intervals through its fleet management system and issues automated alerts to operators when service is approaching or overdue. Any operator who fails to complete scheduled maintenance within the required interval will have their vehicle removed from service until compliance is documented.

Tier 3 — Annual Vehicle Safety Inspection. All vehicles must maintain a current Pennsylvania state safety inspection in accordance with 67 Pa. Code, Chapter 175. The applicant tracks inspection expiration dates for every vehicle in the network and issues advance notifications to operators 60 days and 30 days prior to expiration. No vehicle will be permitted to operate under the applicant's authority with an expired state inspection. In addition to the state-mandated annual inspection, the applicant reserves the right to require supplemental inspections at any time based on vehicle age, mileage, telematics alerts, driver-reported concerns, or following any accident or safety incident. Vehicles found to have defects listed in the Commercial Vehicle Safety Alliance out-of-service criteria are immediately removed from service until repaired and re-inspected.

Tier 4 — Telematics-Based Continuous Monitoring. Beyond the periodic inspection and maintenance tiers described above, the applicant monitors vehicle health and performance in real time through onboard telematics systems installed in every vehicle operating under its authority. Telematics data provides continuous visibility into engine diagnostic codes, battery health, and driving behavior metrics including speed, hard braking, rapid acceleration, and route adherence. This data feeds into the applicant's proprietary "predict and prevent" safety model, which is designed to identify emerging maintenance issues and unsafe driving patterns before they result in vehicle failures or safety incidents. When telematics data indicates a potential maintenance issue — such as an engine warning code or a pattern of abnormal braking — the applicant contacts the operator directly, and the vehicle is flagged for inspection or removed from service until the issue is resolved and documented.

Maintenance Record Retention. Consistent with Part 396, the applicant maintains maintenance records for each vehicle under its control containing the vehicle identification (company number, make, serial number, year, and tire size), a schedule of inspections including type and due date, and records of all inspections, repairs, and maintenance procedures performed. Part 396 requires

retention of these records for at least one year. The applicant retains all maintenance records in its cloud-based system indefinitely, providing a complete, searchable vehicle history that is continuously backed up and protected against data loss. All records are maintained in a secure location with limited access and will be made available for inspection by a Commission Enforcement Officer within two business days of request.

b. System for ensuring vehicles continuously comply with PA vehicle equipment standards (67 Pa. Code, Chapter 175).

The applicant ensures continuous compliance with Chapter 175 through the following integrated system:

Initial Vehicle Approval. Before any vehicle is onboarded into the Shuttlebee network, it must pass the applicant's onboarding inspection, which verifies compliance with all applicable Chapter 175 equipment standards including lighting and electrical systems, glazing and mirrors, brakes, tires, steering, suspension, exhaust system, fuel system, body and frame condition, seat belts, horn, windshield wipers, defrosters, and speedometer. The vehicle must also hold a current Pennsylvania state safety inspection sticker and be no older than 10 model years, ensuring that all vehicles in the network incorporate modern safety equipment including electronic stability control, advanced airbag systems, anti-lock braking systems, and rearview cameras. Any vehicle that does not meet these standards is rejected and may not transport passengers until all deficiencies are corrected and the vehicle is re-inspected.

Ongoing Compliance Monitoring. Continuous compliance with Chapter 175 is maintained through the daily pre-trip and post-trip inspection process described in Tier 1 above. The inspection checklist is specifically mapped to Chapter 175 equipment categories, so that every safety-critical system covered by the regulation is visually verified by the operator at least twice per service day. Any equipment deficiency identified during a daily inspection — including but not limited to burned-out lights, cracked windshields, worn tires, inoperative seat belts, or brake abnormalities — requires the vehicle to be immediately removed from service until the deficiency is corrected and documented.

Telematics Supplementation. The telematics systems described in Tier 4 provide an additional layer of compliance monitoring by alerting the applicant to vehicle conditions that may not be visible during a visual inspection — such as engine

diagnostic codes, battery degradation, or braking system irregularities. This allows the applicant to proactively address emerging equipment issues between scheduled inspections and daily visual checks.

Operator Accountability. For hired-not-owned vehicles, owner-operators in the Shuttlebee network is contractually required to maintain their vehicle in continuous compliance with all applicable equipment standards, maintain current Pennsylvania state safety inspection, complete all daily inspections, adhere to the scheduled preventive maintenance program, and immediately report any equipment deficiency or vehicle damage. Routine in-vehicle camera and telematics reviews will be conducted by Shuttlebee's dispatch team. Failure to comply with any element of the vehicle safety program constitutes grounds for immediate suspension from the network. The applicant conducts periodic audits of operator maintenance records and reserves the right to require an in-person vehicle inspection at any time.

8. Steps taken to obtain insurance and pay required premiums.

Explain what steps you have taken to determine if you can obtain insurance and pay the required insurance premiums.

Shuttlebee Shuttles, Inc. has taken extensive, deliberate steps to secure insurance coverage that meets and exceeds the minimum requirements established by the Commission for paratransit carriers operating vehicles seating 15 passengers or less, as set forth in 52 Pa. Code §§ 32.11– 32.15 and 75 Pa. C.S. §§ 1701–1798 (Motor Vehicle Financial Responsibility Law). The applicant's approach to insurance is not reactive — it is a core competency of the business, informed by deep industry relationships and actuarial expertise that are foundational to the company's operating model.

Co-Founder Insurance Expertise. Shuttlebee Solutions Holding, Inc. co-founder, Somil Jain, is a credentialed actuary with 27 years of experience in the commercial insurance industry, specializing in risk management, underwriting, and regulatory compliance for transportation operations. Mr. Jain's expertise provides the applicant with an institutional understanding of insurance product design, premium structures, loss modeling, and carrier financial requirements that is uncommon among small-fleet paratransit operators. This expertise has been instrumental in the applicant's ability to evaluate coverage options, negotiate favorable terms, and structure its safety and driver qualification programs in ways

that directly reduce underwriting risk — which in turn supports the applicant's ability to obtain and sustain affordable coverage.

Established Relationships with Retail Specialty Agents. The applicant has cultivated relationships with retail insurance agents and brokers who specialize in commercial transportation, livery, and for-hire vehicle coverage. These are not general-market agencies — they are specialty producers with established access to surplus lines carriers, admitted markets, and managing general agents that specifically underwrite small-fleet passenger transportation risks. The applicant's engagement with these specialty agents began well in advance of this application and has included detailed discussions regarding vehicle types, service territory, driver qualification standards, and the applicant's telematics-based safety program. These agents have confirmed their ability to place coverage that meets the Commission's minimum requirements and have provided the applicant with preliminary indications of premium ranges based on the proposed fleet size, vehicle class, and operating territory.

The applicant's relationships with specialty retail agents are particularly important because commercial auto insurance for small-fleet, for-hire passenger carriers is a difficult-to-place risk in the standard admitted market. Many general-market agents lack the appetite, carrier access, or underwriting expertise to place this class of business. Shuttlebee has intentionally built relationships with agents who operate in this niche, ensuring that the company has a reliable, renewable path to coverage as it scales.

Insurance Capacity Partnerships. Beyond retail agent relationships, the applicant has secured letters of intent from insurance capacity partners who have expressed willingness to provide coverage for vehicles operating under the Shuttlebee platform. These partnerships reflect the insurance market's confidence in the applicant's safety infrastructure — including its driver screening and qualification standards,

Shuttlebee University training program, telematics monitoring, and preventive maintenance protocols — as meaningful risk mitigants that support favorable underwriting treatment. The applicant's proactive investment in safety management systems that exceed baseline regulatory requirements directly reduces its risk profile and strengthens its position in obtaining and retaining coverage at competitive premiums.

Understanding of Commission Insurance Requirements. The applicant understands that, upon approval of this application, it must submit evidence of insurance to the Commission prior to providing service in Pennsylvania. The applicant understands that the permanent evidence of insurance will be a Form E for bodily injury and property damage insurance, filed electronically through the NIC Insurance Filing website (www.nicinsurancefilings.com) directly by the home office of the insurance carrier — not by the agent. The applicant understands that mailed insurance forms are no longer acceptable. The applicant further understands that the name and address on the Form E must exactly match the name and address provided on this application.

The applicant is prepared to meet the following minimum insurance limits for carriers operating vehicles seating 15 passengers or less:

- \$35,000 to cover liability for bodily injury, death, or property damage incurred in an accident (BIPD).
- \$25,000 first party medical benefits and \$10,000 first party wage loss benefits, conforming to 75 Pa. C.S. §§ 1701–1798 (Motor Vehicle Financial Responsibility Law).
- First party coverage of the driver of certificated vehicles meeting the requirements of 75 Pa. C.S. § 1711 (relating to required benefits).

The applicant intends to obtain coverage at limits above these minimums, consistent with its commitment to operating at a standard that exceeds baseline regulatory requirements. The applicant has budgeted for insurance premiums as part of its financial planning and has confirmed that projected revenues from its Philadelphia-area operations are sufficient to sustain premium payments on an ongoing basis.

NC Regulatory Sandbox and Insurance Innovation. The applicant has also applied to the North Carolina Regulatory Sandbox to pilot competitive insurance rate structures for its operator network, reflecting the company's broader strategy of working with regulators and insurance markets to develop coverage solutions tailored to the unique risk profile of technology-enabled, safety-managed small-fleet passenger transportation. While this initiative is specific to the applicant's North Carolina operations, it demonstrates the depth of the applicant's engagement with insurance markets and its commitment to building sustainable,

long-term insurance capacity — not merely securing a minimum-compliance policy for initial certification.

Ability to Pay Required Premiums. The applicant has sufficient financial resources to pay required insurance premiums, as reflected in the Statement of Financial Position provided in Question 10 of this application. The applicant's financial position is supported by grant funding, including its selection as an NC IDEA Micro Grant recipient, its completion of the Goldman Sachs 10,000 Small Businesses program, and its current pre-seed fundraising round. The applicant has incorporated insurance premium costs into its operating budget and pricing model, ensuring that premium obligations are covered by projected operating revenues without dependence on external funding sources.

10. Financial Data

Complete the Statement of Financial Position (Balance Sheet) below. Please also provide additional information explaining why you believe you have sufficient funds to ensure your transportation business can provide reliable service to the public in a safe manner.

Funding and Financial Support. In addition to private capitalization, the applicant's financial position is supported by multiple sources of funding and institutional validation:

- **NC IDEA Micro Grant Recipient.** The applicant was competitively selected for a Micro Grant from NC IDEA, one of North Carolina's leading private foundations supporting high-potential startups. This grant provides non-dilutive capital to support business development and market expansion.
- **Goldman Sachs 10,000 Small Businesses Program.** The applicant's CEO completed the Goldman Sachs 10,000 Small Businesses program, a nationally recognized business education and support program that provides access to business services, mentorship, and capital resources. Completion of this program reflects external validation of the applicant's business model, financial management practices, and growth potential.
- **RevTech Labs Accelerator.** The applicant completed the RevTech Labs accelerator program, further demonstrating institutional confidence in the company's business model and market opportunity.

Pre-Seed Investment Round. The applicant is currently raising a pre-seed investment round from early supporters and investors. This fundraising activity reflects market confidence in the applicant's business

model and provides additional capital to support expansion into new service territories including Pennsylvania. The applicant's fundraising is structured to provide runway for market entry, initial customer acquisition, and early operations — ensuring that the company is not dependent on immediate profitability in a new market to sustain safe and reliable service.

Verification of Statement

The undersigned deposes and says that he/she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his/her knowledge, information, and belief.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Signature:	Date: February 24, 2026
Name and Title (printed or typed): Kristina Fahl	