

SHUTTLEBEE SHUTTLES, INC.

Supplemental Responses to Pennsylvania Public Utility Commission
Application for Certificate of Public Convenience — Paratransit Service

Question 1: Service Territory and Vehicle Resources

PUC Inquiry: How do you intend to provide safe, efficient, and reasonable service to so many potential clients with such limited vehicle resources, and with only one proposed local operational presence?

(a) Providing Safe, Efficient, and Reasonable Service

Our model serves a small, defined customer base — student transportation on fixed daily routes, not on-demand service. Each vehicle operates a consistent route serving up to 6 students per run, meaning 1–3 vehicles serve approximately 6–18 families on predictable schedules. We are not attempting to blanket these counties with coverage. Rather, we have a substantial waitlist and confirmed commitments from at least one school partner in each of the three named areas, and we will activate routes only where we have both committed customers and a vetted local operator under contract.

A core part of Shuttlebee’s mission is workforce development — we recruit, train, and mentor independent owner/operators to launch their own student transportation businesses. This development process takes several months, during which these operators serve routes under our umbrella, our authority, and our direct oversight. The breadth of our requested territory reflects this model: as we identify and develop qualified operators in each market, they will begin serving routes under Shuttlebee’s supervision before eventually establishing independent operations. This means our vehicle count will grow organically with each new operator we bring on, rather than requiring Shuttlebee to deploy company-owned fleet across the territory all at once.

Our previous company demonstrated that expanding after establishing a strong service record in a single market is the most effective path to safe, reliable service. We intend to follow that same phased approach here — beginning with concentrated service in the Philadelphia metro area before activating routes in Lehigh and Allegheny Counties as trained operators and demand warrant.

(b) Operational Presence Across Multiple Markets

While our primary local operational presence at launch will be in the Philadelphia metro area, we have confirmed school partnerships that include one school in Allegheny County and one school in Lehigh County. Our dispatch, telematics monitoring, and route management are centralized at our North Carolina headquarters, enabling us to provide consistent oversight across all three markets from day one. This centralized model is essential to our workforce development approach: the owner/operators we develop typically cannot independently afford real-time GPS tracking, predictive analytics, or dedicated dispatch coordination. By centralizing these functions, we bring enterprise-grade oversight to every route and every operator in development — ensuring consistent service quality and immediate response capability while vehicles are in transit. Local operational presence (driver management, vehicle inspections, school relationships) will be established in each market before we begin service there.

Question 2: Owner/Operator Model

PUC Inquiry: Please explain what the owner/operator model entails. The Commission does not allow the use of independent contractors except under the use of a lease for carriers operating with call or demand authority.

Shuttlebee's operational model utilizes two driver arrangements, both fully compliant with Commission regulations:

Shuttlebee-Operated Vehicles

In scenarios where Shuttlebee owns or directly leases the vehicles, drivers will operate as W-2 employees of Shuttlebee, subject to all applicable labor, tax, and regulatory requirements.

Owner/Operator Leased Vehicles

Shuttlebee also utilizes formal vehicle lease agreements in full compliance with 52 Pa. Code § 29.101. Under this structure, owner/operators lease their vehicles to Shuttlebee, and all service is provided under Shuttlebee's certificate of public convenience, Shuttlebee's insurance, and Shuttlebee's direct control and supervision. These are not independent contractor arrangements — Shuttlebee is the certificateholder and bears full regulatory responsibility for the service.

Under both arrangements, each vehicle in service:

- Is covered under Shuttlebee's insurance as provided by § 32.11
- Is inspected prior to entering service to ensure it is in safe operating condition, per § 29.101(c)
- Is operated by a driver who meets all qualifications under Subchapter F, including age requirements, driver history review, criminal background checks, and physical examinations

For owner/operator leased vehicles, lease agreements are executed in writing and specify all terms including compensation, maintenance obligations, and duration, consistent with § 29.101(b).

All dispatch, routing, telematics monitoring, and operational decision-making remain with Shuttlebee at all times. No driver — whether W-2 employee or owner/operator — independently solicits passengers, sets rates, or operates outside of Shuttlebee's direction.

Workforce Development and Umbrella Authority

As noted in our application, a core part of Shuttlebee's mission is workforce development. We recruit, train, and mentor individuals who aspire to launch their own student transportation businesses. The process of developing a qualified operator — including training, vehicle standards compliance, insurance education, and building a service record — takes several months. During this development period, these operators serve routes under Shuttlebee's umbrella authority, providing them with the operational experience and track record necessary to eventually pursue their own certificate of public convenience through the Commission's application process, where required. Shuttlebee's authority is intended to bridge this gap, ensuring that service to families and schools is never interrupted while emerging operators complete the steps necessary to establish independent authority.

This model ensures the Commission's standards for safe, efficient, and reasonable service are met at every stage — both while operators serve under Shuttlebee's certificate and as they transition toward independent authority.

Question 3: Driver Regulations (52 Pa. Code §§ 29.501–509)

PUC Inquiry: You failed to adequately answer all aspects of question #5 of the Verified Statement of Applicant. Please review Title 52 Pa Code §29.501-509 Driver Regulations.

3(a). System for Conducting Criminal Background Checks (52 Pa. Code § 29.505)

Prior to permitting any driver to operate a vehicle in Shuttlebee’s authorized service, Shuttlebee will obtain and review a criminal history record from the Pennsylvania State Police and from every other state in which the applicant has resided during the preceding 12 months, as required by § 29.505(a)(1). Shuttlebee utilizes Verisk ISO IntelliCorp Inquiry to conduct these checks, which include a multistate/multijurisdictional criminal records search with primary source validation and a review of the U.S. Department of Justice National Sex Offender Public Website. Samba Safety provides continuous monitoring between scheduled review periods, alerting Shuttlebee to any changes in a driver’s criminal status in real time.

Any applicant or current driver convicted of a felony or misdemeanor that relates adversely to their suitability to provide service safely and legally will be disqualified, consistent with § 29.505(a)(3). Updated criminal history records will be obtained from the Pennsylvania State Police every two years, per § 29.505(a)(2).

Finally, Shuttlebee recognizes that standard database-driven background checks may fail to identify issues where an applicant has lived in multiple jurisdictions, particularly those that may not offer electronic reporting. For applicants who have resided in Pennsylvania for fewer than 10 years, Shuttlebee utilizes an additional background check conducted by a licensed private investigation firm experienced in reviewing activity across jurisdictions and sourcing records that may not appear in standard electronic databases. This supplemental review provides an added layer of diligence beyond what § 29.505 requires, reflecting Shuttlebee’s commitment to the highest screening standards when entrusting drivers with the transportation of minors.

Pennsylvania Child Protective Services Law (Act 153 of 2014)

Because Shuttlebee’s service exclusively transports minors, all drivers are additionally required to obtain the three clearances mandated under Act 153 prior to entering service: a Pennsylvania State Police Criminal History record (PATCH), a Pennsylvania Child Abuse History Clearance (PACA) through the Department of Human Services, and an FBI Criminal History Background Check via fingerprinting through an approved IdentoGo location. All three clearances must be renewed every 60 months. Shuttlebee will not permit any driver to transport students until all three Act 153 clearances have been obtained, reviewed, and verified. Records of all Act 153 clearances will be maintained in Shuttlebee’s compliance management system alongside the § 29.505 criminal history records.

3(a)(i). Record Retention — Criminal History

All criminal history records will be maintained for a minimum of three years from the date of receipt, consistent with § 29.505(a)(4). Records are stored digitally in Shuttlebee’s secure, cloud-based compliance management system with access restricted to authorized compliance personnel and available for Commission inspection upon request.

3(b). System for Conducting Driver License/History Checks (52 Pa. Code § 29.504)

Prior to permitting any driver to operate a vehicle in Shuttlebee's authorized service, Shuttlebee will obtain and review a driver history from the appropriate agency of every state in which the applicant held a motor vehicle operator's license or permit during the preceding three years, as required by § 29.504(a)(1). Shuttlebee utilizes Samba Safety to pull MVRs across all relevant jurisdictions and to provide continuous driver monitoring, ensuring Shuttlebee is alerted to any license status changes, violations, or suspensions between scheduled review periods. Updated driver histories will be obtained at least once every 12 months, per § 29.504(a)(2).

3(b)(i). Record Retention — Driver History

All driver history records will be maintained for a minimum of two years from the date of receipt, consistent with § 29.504(a)(3). Records are stored digitally in the same secure, cloud-based compliance management system and available for Commission inspection upon request.

Additional Compliance with 52 Pa. Code §§ 29.501–509

As the Commission directed Shuttlebee to review the full driver regulations subchapter, we confirm the following:

§ 29.502 — Current Driver’s License Required. Shuttlebee will not permit any person to operate a vehicle in its authorized service unless that person holds a current, valid driver’s license. License validity is verified at the time of hire through Samba Safety’s MVR pull and monitored continuously thereafter. Any lapse, suspension, or revocation will result in immediate removal from service.

§ 29.503 — Age Restrictions. Shuttlebee will not permit any person to operate a vehicle in its authorized service unless that person is at least 21 years of age. Age verification is completed during the onboarding process through government-issued identification.

§ 29.506 — Alcohol Prohibition. Shuttlebee maintains a zero-tolerance policy. No driver may use alcohol, be under the influence of alcohol, or have any measured alcohol concentration or detected presence of alcohol while operating a vehicle in passenger service. Violation results in immediate removal from service and termination.

§ 29.507 — Controlled Substance Prohibition. Shuttlebee maintains a zero-tolerance policy. No driver may use a controlled substance, be under the influence of a controlled substance, or have any measured concentration or detected presence of a controlled substance while operating a vehicle in passenger service. Violation results in immediate removal from service and termination.

§ 29.508 — Carriers Operating Vehicles Seating 9–15 Passengers, Including the Driver. Shuttlebee’s current fleet consists of 6-student minivans with seating capacities below the 9-passenger threshold. Should Shuttlebee deploy vehicles seating between 9 and 15 passengers including the driver, it will comply with the additional requirements of § 29.508, including ensuring drivers meet any supplemental qualifications applicable to that vehicle class.

Supplemental Safety Measures Exceeding Regulatory Minimums

In addition to the compliance framework above, Shuttlebee implements the following measures that exceed Commission minimums, reflecting the heightened duty of care inherent in transporting minors:

All driver applicants are required to complete a pre-employment driving assessment prior to operating in service. Shuttlebee is evaluating Dreyev, among other partners, to administer these assessments, which evaluate real-world driving behaviors including reaction time, situational awareness, and adherence to safe driving practices. Vehicle condition and history verification is conducted through MeshVI prior to any vehicle entering service.

Once in service, Shuttlebee implements continuous driver performance monitoring and coaching through partnerships with Orion Fleet Intelligence and Lightship Neuroscience. Orion provides telematics-based coaching that identifies risky driving behaviors and delivers targeted corrective feedback. Lightship provides neuroscience-based fatigue detection and cognitive risk assessment, helping Shuttlebee identify and mitigate risk factors before they result in safety incidents. These programs operate in conjunction with Shuttlebee’s centralized dispatch operations, enabling real-time intervention when unsafe driving patterns are detected.

Verification of Statement

I, Kristina Fahl, 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 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).

Signature: <i>Kristina Fahl</i>	Date: March 3, 2026
---------------------------------	---------------------

Name and Title (printed or typed): Kristina Fahl
--