



ATTORNEYS AT LAW

Company Counsel LLC
Two Bala Plaza, Suite 300
Bala Cynwyd, PA 19004
484.325.5660 (office)
484.325.5651 (fax)
bboyle@companycounsel.law

April 22, 2026

Via Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

**Re: Application to Begin Service (Motor Common Carrier of Persons in
Paratransit Service) A-2026-3061859;**

To Whom It May Concern:

This firm represents Carefully Caring Transport LLC in connection with its submitted application to begin service. Please see the attached document containing information requested via the "Request for Information" dated April 21, 2026.

Please contact me with any questions. Thank you.

Sincerely,

Brian T. Boyle, Esq.

CAREFULLY CARING TRANSPORT LLC

Prepared by: Rolanda Robinson, Founder & CEO | Date: April 21, 2026

Question 1: Services Offered by CCT and Populations Served

Carefully Caring Transport LLC (CCT) provides non-emergency transportation services for elderly residents and individuals with disabilities in southeastern Pennsylvania. CCT operates as a vehicle and driver provider under a third-party transportation broker arrangement, the broker manages trip scheduling, dispatching, and passenger coordination, while CCT supplies the qualified drivers and accessible vehicles. The following describes each service in practical terms:

A. Non-Emergency Medical Transportation (NEMT)

CCT provides non-emergency transportation for individuals traveling to and from scheduled medical appointments, therapy sessions, specialist visits, dialysis centers, and other health-related destinations. Vehicles are equipped to accommodate individuals who use wheelchairs or other mobility devices. Trips are arranged and coordinated through a third-party transportation broker. The broker manages trip scheduling, dispatching, and passenger-to-driver matching. CCT's role is to provide qualified drivers and accessible vehicles.

Population served: Adults with physical disabilities, mobility impairments, and elderly individuals who face barriers to accessing standard transportation.

B. Community Access Transportation

CCT also provides transportation to support community integration, including trips to day programs, community activities, grocery shopping, social outings, and other destinations. As with all CCT trips, ride arrangements are coordinated through a third-party transportation broker. CCT supplies the vehicle and qualified driver; the broker handles trip booking, scheduling, and dispatch.

Population served: Elderly residents and individuals with disabilities who require accessible, non-emergency transportation and cannot safely use standard public transportation.

Question 2: Transportation Service — Supplemental Detail

2a. Where Has CCT Been Providing Transportation Service?

CCT will be providing transportation services within the Pennsylvania region: Bucks, Berks, Chester, Delaware, Montgomery, and Philadelphia Counties. Trip assignments within this service area are received through a third-party transportation broker, which identifies passengers, confirms trip details, and dispatches CCT drivers accordingly.

Destinations served include medical facilities, day programs, and community-based locations throughout the greater Philadelphia metropolitan area.

2b. Vehicles Used to Provide Transportation Service

CCT utilizes passenger and wheelchair-accessible vehicles (WAVs) configured to safely transport participants with mobility devices, including manual wheelchairs, power wheelchairs, and scooters. Vehicles meet or exceed ADA accessibility standards and Pennsylvania PUC vehicle requirements. The fleet is maintained under a documented vehicle inspection and maintenance schedule.

Specific vehicle configurations include:

- Side-entry and rear-entry ramp-equipped vans
- Securement systems compliant with WC-19 or equivalent tie-down standards
- Vehicles equipped with seatbelts, safety restraints, and first aid kits
- Vehicles inspected per PUC requirements and maintained with documented service records

2c. Who Is This Service Available To?

CCT's transportation service is available to elderly residents and individuals with disabilities in the Pennsylvania service area who require accessible, non-emergency transportation. The service is not limited to any specific client base.

Passengers are connected to CCT through a third-party transportation broker. The broker receives trip requests from passengers, healthcare providers, referral sources, or other entities and assigns eligible trips to CCT based on vehicle type, availability, and geographic coverage.

2d. How Does CCT Advertise and Acquire Passengers?

CCT acquires passengers through two primary channels: a third-party transportation broker arrangement and direct outreach and advertising to organizations serving the target population.

Through the broker relationship, the broker receives trip requests from passengers and referral sources and dispatches eligible trips to CCT based on vehicle availability, service area, and vehicle type.

In addition to the broker arrangement, CCT actively advertises its services and builds direct relationships with organizations that serve elderly and disabled individuals, including:

- Healthcare systems, hospitals, outpatient clinics, and specialist practices in the five-county region
- Senior centers, Area Agencies on Aging, and assisted living facilities
- Disability-serving organizations, day programs, and community support agencies
- Transportation network companies and regional NEMT brokers operating in southeastern Pennsylvania
- Digital marketing via the CCT website and targeted outreach campaigns directed at referral organizations

Question 3: Comprehensive Driver Compliance System — 52 Pa. Code § 29.503, § 29.504, § 29.505

In response to the PUC's determination that prior answers to questions 5(a) through 5(e) regarding driver records were insufficient, CCT hereby provides a fully detailed compliance system that directly incorporates all requirements under Title 52 Pa. Code § 29, Subchapter F-- Driver Regulations.

CCT has developed and implemented a driver compliance framework that addresses the specific requirements of §§ 29.503, 29.504, and 29.505, including frequency of checks, disqualification standards, documentation requirements, and record retention periods. The following sections address each regulation individually and are followed by an integrated compliance summary table.

§ 29.503 — Age Restrictions: CCT Compliance Policy

Regulatory Requirement:

Under § 29.503(a), a common or contract carrier may permit a person to operate a vehicle in its authorized service only if that person is at least 21 years of age. An exception exists under § 29.503(b) permitting persons aged 18–20 to operate paratransit vehicles if they hold a valid Department of Health (DOH) certification as an Emergency Medical Services Vehicle Operator (EMSVO).

CCT Compliance Procedure:

- CCT will not permit any individual to operate a vehicle in authorized service who has not been verified to be at least 21 years of age prior to their first trip.
- Age verification is completed through review of government-issued photo identification (driver's license or passport) at the time of hire. A copy is retained in the driver's personnel file.
- For any driver who is 18–20 years old, CCT will additionally: (1) verify that the driver holds a current DOH EMSVO certification; (2) require the driver to carry their EMSVO registration on board the vehicle at all times per 28 Pa. Code § 1023.21(h); (3) maintain EMSVO records for a minimum of 4 years, available for inspection by PUC staff on request; and (4) notify the PUC's Bureau of Technical Utility Services within 3 calendar days of any accident, moving violation, reckless driving, or DUI/DWI involving the under-21 driver.
- CCT's current policy is to hire only drivers aged 21 or older. The under-21 protocol is maintained for full regulatory compliance should operational needs change.
- Age documentation is reviewed annually during driver file audits.

Record Retention — § 29.503:

Age verification documentation (copy of government-issued ID) is retained in each driver's personnel file for the duration of employment plus a minimum of 4 years. EMSVO certification records (if applicable) are retained for 4 years per § 29.503(b)(3).

§ 29.504 — Driver History: CCT Compliance Policy

Regulatory Requirement:

Under § 29.504(a)(1), CCT as a common or contract carrier may not permit any person to operate a vehicle in authorized service until it has obtained and reviewed a driver history (Motor Vehicle Record, or MVR) from the appropriate agency of every state in which that person held a motor vehicle operator's license or permit during the preceding 3 years.

Under § 29.504(a)(2), following receipt of the initial driver history report, CCT must obtain a driver history for each driver at least once every 12 months from the date of the last report, from every applicable state licensing agency.

Under § 29.504(a)(3), copies of driver history records must be maintained by the carrier for a minimum of 2 years.

CCT Compliance Procedure:

- Prior to a driver's first day of authorized service, CCT obtains a certified MVR from PennDOT (or the equivalent licensing agency of any other state) covering all states in which the driver held a license or permit in the prior 3 years.
- The MVR is reviewed by the CCT compliance officer for: (a) moving violations, (b) major violations including DUI/DWI, reckless driving, and license suspension, and (c) any patterns indicating unsuitability to transport vulnerable passengers safely.
- Drivers with disqualifying violations are not permitted to operate CCT vehicles.
- A recurring annual MVR check is scheduled for each driver no later than 12 months from the date of the most recent report. CCT uses a compliance calendar (updated quarterly) to track renewal deadlines for each driver on the roster.

- If a driver changes their state of licensure or obtains a license in a new state, an updated multi-state MVR is obtained immediately.
- All MVR records are retained in each driver's compliance file for a minimum of 2 years from the date of each report, per § 29.504(a)(3). CCT retains records for 4 years as internal best practice.

Record Retention — § 29.504:

Driver history records (MVRs) are retained for a minimum of 2 years per § 29.504(a)(3). CCT's internal policy retains these records for 4 years. All records are available for inspection by PUC staff upon request and are maintained in a secure, organized driver compliance binder and digital file system.

§ 29.505 — Criminal History: CCT Compliance Policy

Regulatory Requirement:

Under § 29.505(a)(1), CCT may not permit any person to operate a vehicle in authorized service until it has obtained and reviewed a criminal history record from the Pennsylvania State Police (PSP) and from every other state in which the person resided during the last 12 months.

Under § 29.505(a)(2), following receipt of the initial criminal history record, CCT must obtain and review a new criminal history record for each driver from the PSP every 2 years from the date of the last check.

Under § 29.505(a)(3), CCT may not permit a person to operate a vehicle where that person has a felony or misdemeanor conviction to the extent the conviction adversely relates to the person's suitability to provide service safely and legally. For carriers transporting elderly or disabled individuals, CCT applies heightened scrutiny, particularly for offenses involving violence, abuse, theft, sexual misconduct, or substance abuse.

Under § 29.505, record retention for carrier-maintained criminal history records is required; CCT maintains records for a minimum of 3 years (consistent with call/demand/limousine driver standards under § 29.505) and per CCT policy for 4 years.

CCT Compliance Procedure:

- Prior to a driver's first day of authorized service, CCT submits a request to the Pennsylvania State Police (PSP) for a criminal history background check via the Pennsylvania Access to Criminal History (PATCH) system.
- For any driver who has resided in another state in the past 12 months, CCT also obtains a criminal history record from that state's law enforcement or repository agency (e.g., FBI fingerprint-based check, state bureau of investigation).
- Criminal history records are reviewed by the CCT compliance officer. Any driver with a conviction for a felony or misdemeanor that the compliance officer determines adversely relates to the driver's suitability to safely transport elderly or disabled passengers is disqualified. Disqualifying offense categories include (but are not limited to): crimes of violence or assault, sexual offenses, crimes against vulnerable adults or children, theft or fraud, and drug-related felony convictions.
- Borderline or ambiguous convictions are reviewed on a case-by-case basis with documentation of the reasoning retained in the driver's file.
- A recurring criminal history check is scheduled for each driver every 2 years from the date of the most recent check, per § 29.505(a)(2). CCT tracks these renewal dates using its compliance calendar.
- All criminal history records are maintained in a secure, locked driver compliance file for a minimum of 3 years per regulation and 4 years per CCT internal policy.

- Records are available for inspection by PUC staff upon request. Access to criminal history files is restricted to authorized CCT compliance personnel only.

Record Retention — § 29.505:

Criminal history records are retained for a minimum of 3 years per regulatory standards applicable to carrier-maintained records (consistent with § 29.505), and for 4 years per CCT internal policy. Records are maintained in a secure, organized driver compliance binder (physical) and password-protected digital file system.

Integrated Compliance Summary Table — §§ 29.503, 29.504, 29.505

The table below summarizes CCT's compliance obligations and procedures for each driver regulation under 52 Pa. Code § 29, Subchapter F:

Requirement	§ 29.503 Age	§ 29.504 Driver History	§ 29.505 Criminal History
Initial Check Required Before Driving	Verify age ≥ 21 (or 18–20 with EMSVO cert)	Obtain MVR from every state where licensed in past 3 years	Obtain PSP criminal history + any state of residence in last 12 months
Recurring Frequency	Verify at hire; re-verify if driver turns 21 or status changes	At least every 12 months from prior report	Every 2 years from prior criminal history check
Record Retention Period	4 years (EMSVO records for under-21 drivers)	Minimum 2 years	Minimum 3 years (call/demand/limo); carrier records kept on file
Disqualification Standard	Cannot drive if under 21 without valid EMSVO cert	Carrier reviews for moving violations, major violations	Felony or misdemeanor conviction that adversely relates to safe/legal service
Documentation / Availability	EMSVO cert on board vehicle; records available to PUC on request	MVR on file; available to PUC on request	Criminal history on file; available to PUC on request

Note:

All driver files are organized by employee and maintained in a secure compliance binder at CCT's headquarters (7120 Germantown Avenue, Philadelphia, PA 19119) and mirrored in a digital recordkeeping system. Records are available for PUC inspection upon request with no advance notice required beyond what is operationally necessary to retrieve the file.

Certification

I, Rolanda Robinson, Founder and Chief Executive Officer of Carefully Caring Transport LLC, hereby certify that the responses provided in this document are true, accurate, and complete to the best of my knowledge, and that CCT is committed to full compliance with Title 52 Pa. Code § 29, Subchapter F and all applicable Pennsylvania Public Utility Commission regulations.

Rolanda Robinson

Rolanda Robinson, CEO — Carefully Caring Transport LLC

Date: 4/21/2026