

## NOTICE OF COMPLAINT

- A. You must file an Answer within twenty (20) days of the date of service of this Complaint. The date of service is the mailing date as indicated at the top of the Secretarial Letter for this Complaint and Notice, 52 Pa. Code §1.56(a). An Answer is a written explanation of circumstances wished to be considered in determining the outcome. The Answer should raise all factual and legal arguments that you wish to claim in your defense and must include the reference number of this Complaint. Your Answer must be verified, and the original mailed to:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Or you may **eFile your Answer** using the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov). The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer exceeds 250 pages, you must also file a paper copy with the Secretary's Bureau.

In addition to filing your answer with the Commission's Secretary, a copy should either be:

Mailed to: Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 3W  
Harrisburg, PA 17120

Or, Emailed to: [RA-PCCmplntResp@pa.gov](mailto:RA-PCCmplntResp@pa.gov)

- B. If you fail to answer this Complaint within twenty (20) days, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a penalty. The penalty could include a civil penalty, the suspension or revocation of your operating authority, or other such remedy.
- C. You may elect not to contest this Complaint by paying the civil penalty requested in this Complaint by certified check or money order. Payment must be made to "**Commonwealth of Pennsylvania**" and should be forwarded to:
- Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120
- D. Your payment is an admission that you committed the alleged violation and an agreement to cease and desist from further violations. Upon receipt of your payment, the Complaint proceeding shall be closed.
- E. If you file an Answer, which admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a civil penalty and/or other such remedy..
- F. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge (ALJ) for hearing and decision. The ALJ is not bound by the requested civil penalty.
- G. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code §1.21.
- H. Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
BUREAU OF INVESTIGATION AND ENFORCEMENT	:	
	:	
v.	:	DOCKET NO. C-2026-3049435
	:	
ROGERS TRANSPORTATION LLC	:	
6705 LANSDOWNE AVENUE	:	
PHILADELPHIA, PA 19151	:	

**COMPLAINT**

The Pennsylvania Public Utility Commission (Commission or “PUC”) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Investigation and Enforcement and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Investigation and Enforcement-Motor Carrier Division hereby represents as follows:

1. That ROGERS TRANSPORTATION LLC, Respondent, maintains its principal place of business at 6705 Lansdowne Avenue, Philadelphia, PA 19151.
2. That on May 13, 2024, by Commission Secretarial Letter, Respondent was issued a certificate of public convenience by this Commission authorizing transportation, as a motor common carrier, persons in group and party service, operating vehicles with a seating capacity of more than 15 passengers, including the driver, between points in Pennsylvania, excluding service that is under the jurisdiction of the Philadelphia Parking Authority, at Application Docket No. A-2024-3048894, PUC Utility Code 6422866.
3. That PUC Motor Carrier Enforcement Officer Brian Carpenter was assigned to conduct a Safety Fitness Review (“SFR”). Officer Carpenter initiated a series of attempts to contact Respondent, via telephone and email, receiving no response.
4. That on May 28, 2025, a letter was mailed to Respondent via Certified Mail, at 1736 North Peach Street, Philadelphia, PA 19131, urging compliance with the 180-day requirement in receiving a satisfactory SFR rating. The letter provided a 10-day deadline for Respondent to schedule a SFR. The Certified Mail was returned to the Commission by the postal authorities on or about July 2, 2025, as “unclaimed” and “unable to forward”.
5. That throughout January of 2026, Officer Carpenter initiated a series of attempts to contact Respondent via email, receiving no response.
6. That on February 11, 2026, a letter was mailed to Respondent via Certified Mail, at the address indicated on Respondent’s application for Commission authority, at 6705 Lansdowne Avenue, Philadelphia, PA 19151. The letter urged compliance with the 180-day requirement in receiving a satisfactory SFR rating and provided a 10-day deadline for Respondent to schedule a SFR. Receipt of the Certified Mail was not confirmed.
7. That on April 2, 2026, a letter was mailed to Respondent via First-Class Mail, at Respondent’s principal place of business. The letter urged compliance with the 180-day requirement in receiving a satisfactory rating and provided a 10-day deadline for Respondent to schedule a SFR. The letter sent via First-Class Mail was not returned as undeliverable.

8. That Respondent, by failing to appear for a review and achieve a satisfactory SFR evaluation while certificated by this Commission as a common carrier, violated 66 Pa. C.S. §§501(c),504. The penalty for these violations is cancellation of the certificate held by Respondent with this Commission at PUC Utility Code 6422866.

**WHEREFORE**, the Bureau of Investigation and Enforcement hereby requests that the Commission revoke the certificate of public convenience issued to ROGERS TRANSPORTATION LLC, at PUC Utility Code 6422866.

Respectfully submitted,



Brian B. Mehus, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**VERIFICATION**

I, Brian B. Mehus, 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 that the Bureau will be able to prove the same at any 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.

Date: 23 April 2026



Brian B. Mehus, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement