

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition for Reconsideration from Staff Action

Docket No.: A-2026-3061021

Application No.: A-6428725

In Re: Application of You First Transportation Enterprise LLLP for Paratransit Authority

PETITION FOR RECONSIDERATION

1. Petitioner, Quinzel Tomoney, Owner of You First Transportation Enterprise LLLP, respectfully submits this Petition for Reconsideration from Staff Action regarding the denial and dismissal of the application for Paratransit Authority issued by the Pennsylvania Public Utility Commission dated April 29, 2026.
2. The basis for the denial, as stated in the Commission's letter, was the failure to file required additional information within the prescribed timeframe. Specifically, the Commission issued correspondence dated March 30, 2026 requesting supplemental information necessary to complete processing of the application, and indicated that failure to respond within ten (10) days would result in dismissal.
3. The failure to timely respond was not intentional, willful, or due to neglect. The Commission's request for additional information was inadvertently routed to the company's spam folder and was not discovered during the response period.
4. Immediately upon discovering the Commission's request and the resulting dismissal, Petitioner acted without delay and prepared the required responses and supporting documentation.
5. Petitioner has now submitted an amended and complete response, including a corrected and expanded response to Question #5, specifically addressing driver qualification procedures, driver history verification, annual Motor Vehicle Record reviews, event-triggered compliance reviews, self-reporting obligations, and company record retention procedures.
6. Petitioner respectfully submits that the delayed response was the result of an unintended technological oversight rather than disregard for Commission requirements.
7. Petitioner has implemented additional safeguards to ensure future Commission communications are timely received and addressed.
8. You First Transportation Enterprise LLLP seeks to provide safe, reliable, and compliant paratransit transportation services to the public and remains fully committed to all regulatory obligations.
9. Petitioner respectfully requests that the Commission consider the circumstances surrounding the delayed response, accept the amended and complete submission now provided, and reinstate the application.

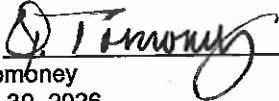
WHEREFORE, Petitioner respectfully requests that the Pennsylvania Public Utility Commission grant this Petition for Reconsideration, vacate the Staff denial, reinstate the application at Docket No. A-2026-3061021, and permit the application process to proceed.

Respectfully submitted,

Quinzel Tomoney  
Owner  
You First Transportation Enterprise LLLP  
2476 78th Avenue  
Philadelphia, PA 19150  
(215) 600-7446

#### VERIFICATION

I, Quinzel Tomoney, hereby verify that the statements made in this Petition for Reconsideration 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: 

Quinzel Tomoney

Date: April 30, 2026

#### Attachments:

- Amended Response to Question #5
- Driver Compliance Policy
- Vehicle Maintenance Policy
- Financial Statement
- Supporting Application Documents

You First Transportation Enterprise LLLP  
2476 78th Avenue  
Philadelphia, PA 19150  
(215) 600-7446

Amended Response to Commission Data Request  
Docket No.: A-2026-3061021  
Application No.: A-6428725

To the Pennsylvania Public Utility Commission:

In response to the Commission's March 30, 2026 Request for Information regarding Question #5 of the Verified Statement of Applicant, You First Transportation Enterprise LLLP respectfully submits the following amended and clarified response regarding our driver license and driver history check procedures.

You First Transportation Enterprise LLLP will conduct driver license and driver history checks prior to hire for all prospective drivers to verify licensing status, driving eligibility, and review driving history before permitting any individual to operate under company authority.

After hire, the company will conduct annual driver license and Motor Vehicle Record (MVR) reviews for every active driver, once every twelve (12) months, to ensure continued compliance with Pennsylvania regulations and to monitor for violations, suspensions, revocations, or any disqualifying driving activity.

In addition to annual reviews, the company will conduct immediate event-triggered driver history reviews whenever the company becomes aware of any accident, citation, license suspension, DUI-related incident, or any event that may affect a driver's qualifications or safety record.

Drivers are required to notify the company within twenty-four (24) hours of any moving violation, arrest involving vehicle operation, license suspension, revocation, or any change in their legal driving status.

All driver qualification records, driver history checks, and annual MVR review documentation will be maintained in the driver qualification file and retained in accordance with applicable regulatory requirements.

This amended response clarifies that the company's official policy is: prior to hire and annually thereafter, with additional event-triggered reviews as necessary. This policy replaces any prior inconsistent statements and is intended to fully comply with Title 52 Pa. Code §29.504.

Respectfully submitted,

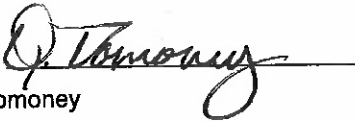
Quinzel Tomoney

Owner

You First Transportation Enterprise LLLP

VERIFICATION

I, Quinzel Tomoney, 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:  \_\_\_\_\_  
Quinzel Tomoney

Date: April 30, 2026

March 18, 2026

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

**Re:** Docket No. A-2026-3061021 – You First Transportation Enterprise LLLP  
Response to Data Request Letter (10-Day Letter)

Dear Secretary, Homsher:

You First Transportation Enterprise LLLP hereby submits the following responses to the Commission's Data Request Letter dated March 18, 2026, in connection with the above-captioned docket:

**Response to Request No. 1 – Service Area**

You First Transportation Enterprise LLLP proposes to provide non-emergency medical paratransit service originating from (pick-up) and terminating at (drop-off) points within the following five (5) counties of the Commonwealth of Pennsylvania:

**From points in the Counties of Philadelphia, Bucks, Chester, Delaware, and Montgomery, Commonwealth of Pennsylvania, to points within those same five (5) counties, and return.**

These five counties constitute the greater Southeastern Pennsylvania region. The service area boundaries are defined by the official county lines of Philadelphia County, Bucks County, Chester County, Delaware County, and Montgomery County as established under Pennsylvania law, all of which are clearly identifiable on any standard Pennsylvania county map.

**Response to Request No. 2 – Driver Hiring Standards and Regulations (52 Pa. Code §§ 29.501–509)**

**a. Hiring Standards for Drivers (52 Pa. Code § 29.503 – Age Restrictions)**

You First Transportation Enterprise LLLP will require all prospective drivers to meet the following minimum hiring standards prior to employment:

**i. Age Restrictions:**

All drivers must be a minimum of twenty-one (21) years of age at the time of hire, in accordance with 52 Pa. Code § 29.503. No individual under the age of 21 will be permitted to operate a vehicle in service as a driver for this company.

Additional hiring requirements include possession of a valid Pennsylvania driver's license appropriate for the class of vehicle operated; a clean driving history as verified by an MVR

check; successful completion of a criminal background check; physical fitness to safely operate a vehicle and assist passengers; and completion of any required company orientation and training.

You First Transportation Enterprise LLLP will implement a comprehensive, written preventive maintenance program for all vehicles operated in service. The maintenance plan is as follows:

**a. Regular Scheduled Maintenance:**

Yes. The company will perform regular, scheduled preventive maintenance on all vehicles in its fleet, including but not limited to the following:

- a. Daily Pre-Trip Inspection (Driver-Conducted): Prior to each day's service, the assigned driver will conduct a pre-trip inspection of the vehicle covering: lights (headlights, brake lights, turn signals, hazard lights); tires (inflation, tread wear, visible damage); fluid levels (oil, coolant, brake fluid, washer fluid); brakes (pedal feel, parking brake function); mirrors and windows; wheelchair lift or ramp operation and condition (if applicable); cleanliness and sanitation of passenger compartment; seatbelts and passenger restraints; and horn and windshield wipers. A completed pre-trip inspection form will be signed by the driver and retained in the vehicle maintenance file.
- b. Preventive Maintenance Service / Oil Changes: Full preventive maintenance service, including oil and filter changes, will be performed every 5,000 to 7,500 miles, or as recommended by the vehicle manufacturer, whichever is more frequent.
- c. Brake and Tire Inspection: A formal inspection of all brake components and tires will be conducted every three (3) months, regardless of mileage.
- d. Wheelchair Lift / Accessibility Equipment Inspection (if applicable): Any wheelchair lift, ramp, or security system will be inspected monthly by a qualified technician to ensure proper and safe operation.
- e. Full Mechanical Inspection / Pennsylvania State Inspection: All vehicles will undergo a full mechanical inspection and Pennsylvania annual safety inspection in accordance with 67 Pa. Code Chapter 175 on a yearly basis.

**b. Maintenance Schedule Summary:**

- f. Daily – Pre-trip inspection (driver-conducted, written form)
- g. Every 5,000–7,500 miles – Preventive maintenance service and oil change
- h. Every 3 months – Brake and tire inspection
- i. Monthly – Wheelchair lift/ramp inspection (if applicable)
- j. Annually – Full mechanical inspection and Pennsylvania State Safety Inspection (67 Pa. Code Ch. 175)

All maintenance performed will be documented in a maintenance log maintained for each individual vehicle. Records will include the date of service, mileage at service, description of work performed, name of technician or service facility, and any parts replaced. Maintenance records will be retained for the life of the vehicle plus three (3) years and will be made available to the Commission upon request.

**Response to Request No. 4 – System for Ensuring Compliance with Pennsylvania Vehicle Equipment Standards (67 Pa. Code Chapter 175)**

You First Transportation Enterprise LLLP will implement the following system to ensure continuous and ongoing compliance with the applicable Pennsylvania vehicle equipment standards set forth in 67 Pa. Code Chapter 175:

- k. Annual Pennsylvania State Safety Inspection: All vehicles will be submitted for and must pass the annual Pennsylvania vehicle safety inspection conducted by a PennDOT-certified inspection station, as required by 67 Pa. Code Chapter 175. No vehicle with an expired or failed inspection sticker will be placed or maintained in service.
- l. Daily Pre-Trip Inspections: As described in Response No. 3 above, drivers will conduct and document a daily pre-trip inspection to identify any equipment deficiencies before a vehicle is placed in service. Any vehicle found to be non-compliant with applicable equipment standards during a pre-trip inspection will be immediately removed from service and will not be returned to service until all deficiencies are corrected and documented.
- m. Scheduled Periodic Inspections: Quarterly brake and tire inspections and periodic preventive maintenance services (described in Response No. 3) will include a review of vehicle equipment for compliance with Chapter 175 standards, including lighting, brakes, tires, mirrors, windshields, wipers, seat belts, and all required safety equipment.
- n. Immediate Removal from Service Policy: Any vehicle that is found to have a defect or equipment failure that renders it non-compliant with 67 Pa. Code Chapter 175 will be immediately placed out of service. The vehicle will not be returned to service until the defect has been repaired and verified by a qualified mechanic, and the repair is documented in the vehicle's maintenance log.
- o. Recordkeeping: All inspections, repairs, and corrective actions taken to maintain compliance with 67 Pa. Code Chapter 175 will be documented in each vehicle's individual maintenance log and retained as described in Response No. 3 above.
- p. Management Oversight: The owner/operator will conduct periodic reviews of each vehicle's maintenance and inspection records to ensure that all vehicles are in continuous compliance with applicable equipment standards.

**Response to Request No. 5 – Revised Statement of Financial Position**

The following is the revised Statement of Financial Position for You First Transportation Enterprise LLLP, reflecting exact figures as required:

**ASSETS**

**Current Assets:**

Bank Account Balance (Checking/Operating): **\$16,000.00**

**Fixed Assets:**

2014 Ford Multi-Purpose Vehicle (MPV) – Fair Market Value (approximate): **\$12,000.00**

**TOTAL ASSETS: \$28,000.00**

**LIABILITIES**

Vehicle Loan Balance: \$0.00 (vehicle is owned free and clear, no outstanding balance)

Lease Obligations: \$0.00 (no lease obligations)

Outstanding Loans: \$0.00 (no outstanding loans)

Credit Lines: \$0.00 (no credit lines)

**TOTAL LIABILITIES: \$0.00**

**NET WORTH (Total Assets minus Total Liabilities): \$28,000.00**

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**VERIFICATION PURSUANT TO 52 Pa. Code § 1.36**

I, Quinzel Tomoney, 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).



Quinzel Tomoney, Owner

You First Transportation Enterprise LLLP

Date: 4/30/2024

Respectfully submitted,



Quinzel Tomoney, Owner

You First Transportation Enterprise LLLP

Docket No. A-2026-3061021

## Plain English Summary – 52 Pa. Code §§ 29.501–509 Driver Regulations

### §29.501 Applicability

These regulations apply to companies transporting passengers such as non-emergency medical transportation (NEMT), limousine service, airport transfers, and group transportation services.

### §29.502 Driver License Requirements

All drivers must maintain a valid driver's license appropriate for the vehicle operated. The company verifies licenses prior to hire and monitors license status to ensure no suspensions or expirations occur.

### §29.503 Age Requirements

All drivers must meet minimum legal driving age requirements. As a company policy, You First Transportation Enterprise LLLP requires all drivers to be at least 21 years of age to meet insurance and safety standards.

### §29.504 Driver History Checks

The company conducts Motor Vehicle Record (MVR) checks prior to hire, one year after hire, and every two years thereafter. Records are reviewed for violations and maintained in driver qualification files.

### §29.505 Criminal Background Checks

Criminal background checks are completed prior to hire, one year after hire, and every two years thereafter. Individuals with violent offenses, sexual offenses, DUI history, drug trafficking convictions, or crimes involving vulnerable populations are disqualified from employment.

### Driver Compliance Checklist

Each driver file will contain driver application, copy of driver's license, MVR report, criminal background check, training records, and policy acknowledgements. Records are retained according to PUC requirements and made available upon request.

### Additional Driver Compliance Policies

#### Driver Qualification File (DQF) Requirements:

The company will maintain a Driver Qualification File for each driver containing:

- Employment application
- Copy of valid driver's license
- Motor Vehicle Record (MVR)
- Criminal background check results
- Driver training documentation
- Drug and alcohol policy acknowledgment
- Annual MVR reviews
- Incident/accident reports if applicable
- Medical certification if required

All records will be maintained securely and made available to the PUC upon request.

#### Drug and Alcohol Policy:

You First Transportation Enterprise LLLP maintains a zero-tolerance drug and alcohol policy. Drivers are prohibited from reporting to duty under the influence of alcohol or controlled substances. Drivers may not consume alcohol while on duty or within a reasonable period before duty. Any violation will result in immediate removal from safety-sensitive functions and possible termination. The company reserves the right to conduct reasonable suspicion testing if impairment is suspected.

#### Driver Compliance Audit Checklist:

The company will periodically review driver files to ensure compliance. Reviews include:

- Valid license verification
- Current background check
- Updated MVR review
- Required training completion
- Policy acknowledgements
- Record retention compliance

This process ensures ongoing compliance with 52 Pa. Code §§29.501-509.

## Additional Safety and Compliance Policies to Support PUC Approval

### Driver Training Program:

All drivers will complete initial and ongoing training to ensure safe transportation of passengers.

Training includes:

- Passenger assistance techniques
- Wheelchair securement procedures (if applicable)
- Defensive driving practices
- HIPAA awareness and passenger confidentiality
- CPR and First Aid awareness (recommended)
- Emergency procedures and accident response
- Sensitivity training for transporting elderly and disabled passengers

Refresher training will be provided annually or as needed. Training records will be maintained in each driver's qualification file.

### Safety Supervision and Monitoring Policy:

Management will actively monitor driver performance and safety through:

- Periodic driver record reviews
- Incident and accident review procedures
- Random ride observations when appropriate
- Customer feedback monitoring
- Corrective action procedures when safety issues are identified

Any driver demonstrating unsafe behavior will be subject to retraining, suspension, or termination depending on severity.

### Customer Complaint Resolution Procedure:

The company will maintain a formal complaint process to address service concerns:

- All complaints will be documented
- Complaints will be reviewed by management
- Corrective action will be taken if necessary
- Complaint records will be maintained for review
- Customers may submit complaints by phone or email

This process helps ensure continuous service improvement and regulatory compliance.

### Regulatory Compliance Oversight:

The company owner or designated compliance manager will be responsible for ensuring compliance with all Pennsylvania Public Utility Commission regulations, including driver qualifications, vehicle maintenance, insurance requirements, and operational safety standards.

Periodic internal reviews will be conducted to verify compliance readiness for any PUC audit or inspection.

## b. System for Conducting Criminal Background Checks (52 Pa. Code § 29.505 – Criminal History)

### i. Frequency of Criminal Background Checks:

You First Transportation Enterprise LLLP will conduct criminal background checks on all drivers according to the following defined schedule:

- Pre-Hire (Mandatory): A comprehensive criminal background check will be completed before employment. No applicant will be permitted to transport passengers until cleared.
- 1 year after hire
- Every 2 years thereafter (biennially)

ii. Disqualifying Criminal Offenses:

Drivers will be disqualified for:

- Violent felonies (assault, weapons, etc.)
- Sexual offenses (including Megan's Law)
- DUI/DWI within past 7 years
- Theft/fraud within past 7 years
- Drug trafficking
- Abuse/neglect of vulnerable populations
- Any felony within past 10 years
- Pattern of unsafe misdemeanor behavior

iii. Record Retention:

- Stored in Driver Qualification File (DQF)
- Retained for 5 years OR employment + 3 years
- Secure storage and available to PUC upon request

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

i. Frequency of Checks:

Defined "periodically" as:

- Pre-hire
- 1 year after hire
- Every 2 years thereafter
- Annual internal license verification
- Immediate driver self-reporting of violations/suspensions

Driver Disqualification:

- Suspended/revoked license
- DUI within 7 years
- Reckless driving
- Excessive violations
- Unsafe accident history

ii. Record Retention:

- Maintained in DQF
- Retained for 5 years OR employment + 3 years
- Available to PUC upon request

## AMENDED RESPONSE TO REQUEST NO. 5 – DRIVER HISTORY COMPLIANCE AMENDMENT

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

You First Transportation Enterprise LLLP will maintain a formal driver qualification and monitoring system to ensure all drivers remain qualified and safe to transport passengers.

Before any applicant is hired or permitted to transport passengers, the company will verify that the applicant possesses a valid driver's license and will obtain a Motor Vehicle Record (MVR) to review the applicant's complete driving history. This review includes moving violations, accident history, license suspensions, revocations, reckless driving incidents, DUI convictions, and any other conduct affecting driver safety qualifications.

No applicant will be permitted to begin service until the company completes and approves the driver history review.

After employment begins, You First Transportation Enterprise LLLP will conduct driver license and driver history checks annually for all active drivers by obtaining an updated Motor Vehicle Record (MVR) and verifying the continued validity of the driver's license.

In addition to annual reviews, the company will conduct immediate additional driver history reviews whenever management becomes aware of an event that may affect a driver's qualifications, including accidents, traffic citations, license suspensions, license revocations, DUI arrests or convictions, and serious moving violations.

All drivers are required to notify the company within twenty-four (24) hours of any citation, accident, suspension, revocation, or arrest involving operation of a motor vehicle.

Drivers may be disqualified from service for suspended or revoked licenses, DUI convictions, reckless driving, excessive moving violations, unsafe accident history, or any serious safety-related violation affecting passenger safety.

All driver history records, including Motor Vehicle Records (MVR), annual review documentation, and corrective action records, will be maintained in the Driver Qualification File (DQF) and retained for the duration of employment plus three (3) years, and will be made available to the Commission upon request.