

RESPONSE TO DATA REQUEST
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
Docket No.: A-2026-3061885

1. INTRODUCTION

Application of:

True Companions LLC

True Companions LLC (hereinafter referred to as the “Applicant”), by and through its authorized representative, Thomas Morrin, hereby submits this Response to the Data Request issued by the Pennsylvania Public Utility Commission (the “Commission”) in connection with the above-referenced application for authority as a Motor Contract Carrier of Passengers.

The Applicant acknowledges receipt of the Commission’s correspondence dated April 22, 2026 , requesting additional information necessary to proceed with the review of the application.

In accordance with the Commission’s request, the Applicant provides the following detailed and structured responses addressing each item raised. These responses are submitted to clarify the Applicant’s operational structure, service model, intended service territory, contractual framework, and compliance systems, and to demonstrate the Applicant’s readiness to operate in full compliance with applicable regulatory requirements.

The Applicant respectfully submits that the information provided herein satisfies the Commission’s request and supports the continuation of the application process.

2. RESPONSE TO QUESTION 1

BUSINESS FUNCTION, WHO IS TRANSPORTED, WHO PAYS

The Applicant, True Companions LLC, operates as a service provider offering both home care support services and non-emergency medical transportation (NEMT) as a distinct and structured service line. While the Applicant is identified as a home health agency, the transportation component of the business is organized as a separate operational function dedicated to providing

contract-based passenger transportation services in compliance with the requirements of a Motor Contract Carrier of Passengers.

The Applicant's transportation services are specifically focused on wheelchair-accessible and mobility-assisted transport, serving individuals who require additional support during transit. This includes, but is not limited to:

- Elderly individuals residing in assisted living or long-term care facilities
- Patients requiring transportation to and from medical appointments, rehabilitation centers, or healthcare facilities
- Mobility-impaired individuals, including wheelchair-bound passengers who require safe and assisted transport

All transportation services will be provided on a pre-arranged, contract basis, and not on a call or demand basis, in accordance with Contract Carrier operations.

With respect to payment for transportation services, the Applicant will operate under a structured multi-source payment model, which includes:

- **Private-pay arrangements**, where individual clients or their families directly compensate the Applicant for transportation services
- **Contracted healthcare and assisted living facilities**, which may arrange and pay for transportation services on behalf of their residents or patients
- **Third-party program participation**, including anticipated participation with Medicaid transportation programs and/or licensed NEMT brokers, subject to completion of required enrollment processes and execution of formal agreements

At this stage, the Applicant is in the process of establishing these relationships and will ensure that all billing and payment arrangements are conducted in full compliance with applicable state regulations and program requirements.

The Applicant respectfully submits that its operational model clearly defines the nature of its services, the class of passengers to be transported, and the structure of payment arrangements, consistent with the expectations for a Contract Carrier of Passengers.

3. RESPONSE TO QUESTION NO. 2

SERVICE TERRITORY

The Applicant acknowledges the Commission's requirement for a clearly defined and specific service territory for Contract Carrier operations.

Accordingly, the Applicant hereby designates its service territory as originating from the following counties within the Commonwealth of Pennsylvania:

- **Montgomery County**
- **Chester County**
- **Delaware County**
- **Philadelphia County**
- **Bucks County**

All transportation services will originate from the above-listed counties and extend to destinations within the Commonwealth of Pennsylvania, including return trips, in accordance with the Applicant's contract-based service model.

The Applicant confirms that no transportation services will originate outside of the specified counties unless and until such authority is formally amended through the appropriate application process with the Commission. The Applicant further acknowledges that the scope of its authority is limited to the defined territory stated herein, and any expansion of service territory or addition of new operational areas will be subject to prior approval by the Commission in compliance with applicable regulatory requirements.

The Applicant respectfully submits that the above designation clearly defines the boundaries of its proposed service territory and satisfies the Commission's requirement for specificity in Contract Carrier authority.

4. RESPONSE TO QUESTION NO. 3

CONTRACTS / PARTNERS / INTENT

The Applicant acknowledges the Commission's requirement to clearly identify the organizations with which it intends to establish contractual relationships as a Contract Carrier of Passengers.

In response, the Applicant hereby provides the following list of organizations within its proposed service territory that have been identified as target service partners for the provision of non-emergency wheelchair-accessible transportation services:

- **Assured Home Care** - Philadelphia County, Pennsylvania
- **Brandywine Haverford Estates by Monarch** - Delaware County, Pennsylvania
- **The Residence at Bala Cynwyd** - Montgomery County, Pennsylvania
- **Fair Acres Geriatric Center** - Delaware County, Pennsylvania

These organizations represent healthcare-related service providers, including home care agencies, assisted living facilities, and long-term care providers, whose client populations require structured and reliable transportation services for medical appointments, rehabilitation services, and related care needs.

The Applicant is in the process of establishing service relationships with the above-listed entities and intends to enter into formal written agreements with such organizations upon approval of operating authority by the Commission. All transportation services will be performed strictly under contractual arrangements, consistent with the requirements governing Contract Carrier operations.

The Applicant further affirms that any additional brokers, healthcare providers, or organizations not listed herein will not be served under the requested authority unless and until such entities are formally added through the appropriate application process in compliance with Commission requirements.

The Applicant respectfully submits that the identification of the above entities, together with its commitment to operate exclusively under written contracts, satisfies the Commission's requirements for establishing a defined contractual service framework.

5. RESPONSE TO QUESTION NO. 4

DRIVER COMPLIANCE SYSTEM

The Applicant acknowledges the Commission's concern regarding the sufficiency of its prior responses to the driver qualification and compliance requirements set forth under 52 Pa. Code § 29.503, § 29.504, and § 29.505. In response, the Applicant has established and will implement a structured driver compliance and recordkeeping system, as detailed below.

A. Driver Qualification Standards (52 Pa. Code § 29.503 - Age Restrictions)

The Applicant requires that all drivers meet the following minimum qualification standards:

- Drivers must be at least twenty-three (23) years of age
- Drivers must possess a valid driver's license appropriate for the class of vehicle operated
- Drivers must be physically capable of safely assisting mobility-impaired passengers, including wheelchair-bound individuals

B. Driver History and Motor Vehicle Record Review (52 Pa. Code § 29.504 - Driver History)

Prior to employment and on an ongoing basis, the Applicant will implement the following procedures:

- Obtain and review each driver's Motor Vehicle Record (MVR) prior to hire
- Conduct periodic MVR reviews at least annually to ensure continued compliance
- Disqualify or take corrective action for drivers with:
 - Suspended or revoked licenses
 - Excessive moving violations
 - Serious traffic offenses that may impact passenger safety

C. Criminal Background Screening (52 Pa. Code § 29.505 - Criminal History)

The Applicant will conduct criminal background checks for all drivers prior to employment, including:

- Review of criminal history records in accordance with applicable state regulations
- Disqualification of individuals with offenses that may pose a risk to passenger safety
- Maintenance of documentation evidencing completion of background screening

D. Driver Training and Operational Readiness

The Applicant will ensure that all drivers are adequately trained to perform their duties safely and effectively, including:

- Training in wheelchair handling and securement procedures
- Passenger assistance techniques for elderly and mobility-impaired individuals
- Basic safety protocols and emergency response procedures

The Applicant has identified an initial driver, **Anthony Casey**, who holds a Commercial Driver's License (CDL) and has completed transportation-related operational training, and will ensure that all future drivers meet equivalent standards.

E. Recordkeeping and Compliance System

The Applicant will maintain a structured recordkeeping system for all driver-related documentation, including:

- Driver qualification files
- Copies of valid driver's licenses
- Motor Vehicle Record (MVR) reports
- Criminal background check records
- Training records and certifications

All records will be:


- Maintained in an organized and secure manner
- Retained for a minimum period consistent with applicable regulatory requirements
- Reviewed and updated on a periodic basis to ensure continued compliance

The Applicant respectfully submits that the above system establishes a comprehensive and compliant framework for driver qualification, monitoring, and recordkeeping, in accordance with the requirements of 52 Pa. Code Chapter 29, and fully addresses the deficiencies identified by the Commission.

VERIFIED STATEMENT

I, **Thomas Morrin**, 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).

Date: 04/29/2026

Signature: 

Name: Thomas Morrin

Title: Authorized Representative

Company: True Companions LLC

LETTER OF INTENT FOR TRANSPORTATION SERVICES

Date: 04/29/2026

To Whom It May Concern,

This Letter of Intent is issued to confirm that Assured Love Home Care, located at 3565 Kensington Avenue, Philadelphia, Pennsylvania 19134, has identified a need for reliable non-emergency transportation services for its client population and has expressed interest in engaging the services of True Companions LLC.

True Companions LLC proposes to provide non-emergency, wheelchair-accessible transportation services to support individuals requiring assistance to and from medical appointments, rehabilitation services, and other healthcare-related destinations. These services are intended to serve elderly, mobility-impaired, and medically dependent individuals under the care of Assured Love Home Care.

Both parties acknowledge that the services described herein are intended to be provided on a pre-arranged, contractual basis, consistent with the operational requirements of a Motor Contract Carrier of Passengers under the jurisdiction of the Pennsylvania Public Utility Commission.


This Letter of Intent reflects a mutual understanding of potential collaboration and is provided in support of True Companions LLC's application for operating authority. It is expressly understood that this document does not constitute a binding agreement yet, and that any formal service arrangement will be subject to the execution of a definitive written contract upon approval of the necessary regulatory authority and mutual agreement of terms.

Sincerely,

Kassandra Brown

Director

Assured Love Home Care

Signature: 

Date: 04/29/2026