

**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verified Statement of Applicant — Responses to Items 4 through 8

Legal Name of Applicant	Star Medical Transport Services LLC
Trade Name	LifeMed
Street Address (principal place of business)	401 E Hunting Park Ave
City / Municipality	Philadelphia
State	Pennsylvania
Zip Code	19124
Existing PUC Certificate — Docket No.	A-2016-2579059 (Utility Code 6419423)
Nature of Application	Petition to Amend Certificate of Public Convenience — expand service territory and clarify operating authority (paratransit service, including non-medical transportation)

This document provides the applicant's responses to Items 4 through 8 of the Verified Statement of Applicant, supplementing the materials previously submitted in support of the Petition to Amend the Certificate of Public Convenience held by Star Medical Transport Services LLC (d/b/a LifeMed) at Docket No. A-2016-2579059. These responses describe the applicant's current operations, which will be extended throughout the proposed expanded service territory of Chester, Delaware, Montgomery, and Philadelphia Counties.

Item 4 — Facilities, Records, and Communications

Physical Location

The applicant maintains a single principal place of business at 401 E Hunting Park Ave, Philadelphia, PA 19124, an approximately 6,000-square-foot facility that serves as its administrative headquarters and operating dispatch center. The facility houses executive and administrative offices, a dispatch operations area, secured records storage (both paper and digital), and on-site vehicle parking and staging for the company's wheelchair-accessible paratransit fleet. The applicant operates from this single location and maintains no satellite or secondary locations. The facility currently supports operations under the existing PUC certificate and has the capacity to support the expanded territory without relocation.

Office Equipment and Systems

The administrative office is equipped with networked desktop workstations, multifunction printer/scanner devices, secure document storage, and broadband internet connectivity. For scheduling, dispatch, run assignment, and routing, the applicant uses Traumasoft, a GPS-

enabled electronic dispatch and trip management platform. The applicant uses Paylocity for payroll and human resources, and standard productivity software for general business records.

Record Maintenance Plan

The applicant maintains all records required by the Commission, including but not limited to:

- Driver qualification files (license, medical examiner's certificate, motor vehicle record, criminal background check, drug-and-alcohol testing records, training documentation, and proof of identity);
- Vehicle files (title and registration, periodic inspection certificates, maintenance and repair history, daily vehicle inspection reports, and accident/incident reports);
- Trip and revenue records (manifests, run sheets, dispatch logs, and billing records) maintained in accordance with 52 Pa. Code retention requirements;
- Insurance records (current certificates of insurance, prior policy declarations, and proof of continuous coverage);
- Financial records (payroll, accounts payable and receivable, general ledger, bank statements, and tax filings) maintained under the direction of the Chief Financial Officer.

Records are retained for the periods required by the Commission and other applicable authorities. Paper records are stored in secured, fire-resistant filing within the principal place of business; electronic records are maintained on secured systems with role-based access and routine backup.

Communications Network and Dispatch

Customer requests for transportation are received through multiple channels: (1) direct telephone calls to the dispatch line during posted operating hours and through an after-hours line for next-day scheduling; (2) electronic trip orders from contracted transportation brokers and managed care organizations; (3) facility-direct standing orders for recurring transports; and (4) email and fax for facility coordinators.

Trip orders are entered into the Traumasoft dispatch system, assigned to a wheelchair-accessible vehicle and driver based on geography and timing, and transmitted to the assigned driver. Dispatch maintains continuous two-way communication with all drivers on duty via company-issued mobile devices supporting voice, text, and dispatch-platform messaging. GPS-enabled tracking through Traumasoft is used to monitor vehicle location, on-time performance, and to support real-time re-routing in response to schedule changes, traffic, or facility delays.

This dispatch and communications infrastructure already supports operations under the existing certificate and is capable of supporting service throughout the proposed expanded territory.

Item 5 — Drivers

The applicant currently employs fourteen (14) wheelchair-accessible paratransit drivers. This driver complement is sufficient to staff the applicant's existing paratransit operations, and the

applicant is positioned to recruit and train additional drivers as service in the expanded territory requires. Driver staffing is reviewed on a regular basis so that it remains appropriate to the territory served.

(a) Hiring Standards

All driver applicants must, at a minimum:

- Be at least 21 years of age (or as otherwise permitted by applicable law) and legally authorized to work in the United States;
- Hold a valid Pennsylvania driver's license of the appropriate class for the vehicle to be operated;
- Pass a pre-employment criminal background check and motor vehicle record review meeting the applicant's published standards;
- Pass a pre-employment Department of Transportation-style drug screen;
- Hold or obtain a current medical examiner's certificate where required for the class of service;
- Successfully complete the applicant's new-hire training program prior to operating in revenue service.

(b) Criminal Background Checks

Pre-employment criminal background checks are conducted through a qualified third-party consumer reporting agency operating under the Fair Credit Reporting Act. Checks include, at minimum, a Pennsylvania State Police criminal record check, a multi-state criminal database search, the national sex offender registry, and any additional checks required by contracting payers (including, where applicable, FBI fingerprint-based checks for MATP credentialing). Findings are reviewed against the applicant's written eligibility standards before any hiring decision is made; disqualifying offenses are documented in the driver qualification file.

(c) Driver Training Program

Each new driver completes a structured new-hire orientation and training curriculum before being released to revenue service. Training is delivered through a combination of classroom instruction, written materials, video, behind-the-wheel observation, and supervised in-service trips, and covers at minimum:

- Company policies, code of conduct, and HIPAA / patient privacy obligations;
- Defensive driving and passenger safety, including pre-trip vehicle inspection;
- ADA awareness and disability sensitivity, including service to persons who are blind, deaf, hard of hearing, ambulatory-impaired, or cognitively impaired;
- Wheelchair securement, including Qstraint and equivalent securement systems, and ramp and lift operation;

- Stair chair operation and safe patient handling, including dispatch procedures for stair-chair-required trips;
- Bloodborne pathogen exposure prevention and spill response;
- Drug-and-alcohol policy, reasonable suspicion identification, and post-accident procedures;
- Emergency response, accident reporting, and incident documentation.

Refresher training and competency reviews are conducted on a recurring basis and after any reportable incident. Training records are retained in each driver's qualification file.

(d) Driver License Checks

Driver license status is verified at hire and re-verified on a recurring basis through PennDOT motor vehicle record checks. In addition, each driver is required by policy to immediately self-report to the applicant any citation, suspension, revocation, accident, or change in license status. The Compliance Officer maintains a tracking log of license expiration dates, medical examiner's certificate expirations, and recurring MVR check dates; expirations trigger administrative removal from service until renewal is documented.

(e) Drug and Alcohol Policy

The applicant maintains a written drug-and-alcohol-free workplace policy that is provided to every driver at hire and is acknowledged in writing. The policy prohibits the use, possession, sale, or being under the influence of alcohol or controlled substances while on duty, in company vehicles, or on company property. Testing is conducted under the following circumstances:

- Pre-employment;
- Reasonable suspicion, based on documented observation by a trained supervisor;
- Post-accident, in accordance with policy and contractual requirements;
- Random selection, administered through a third-party administrator using a scientifically valid selection method;
- Return-to-duty and follow-up testing, where applicable.

A confirmed positive test, refusal to test, or other violation of the policy results in immediate removal from safety-sensitive duty and disciplinary action up to and including termination, in accordance with the written policy.

Item 6 — Vehicles

The applicant operates a fleet of fifteen (15) wheelchair-accessible paratransit vehicles currently in revenue service, consisting of ADA-compliant lift- and ramp-equipped vans. This fleet is sufficient to serve the applicant's existing certificated territory, and the applicant is currently operating below maximum capacity. Additional wheelchair-accessible vehicles will be placed into service as service in the expanded territory requires; the applicant has both the financial

capacity and established vendor relationships to acquire and convert additional vehicles, and maintains additional newly acquired units being prepared for service.

No vehicle used in paratransit service has a seating capacity of more than 15 passengers including the driver, as required by Commission regulation. Each vehicle is configured for wheelchair-accessible, non-medical passenger transportation.

The wheelchair-accessible vehicles currently in paratransit service are listed in the following table:

UNIT #	YEAR	MAKE	MODEL	SEAT. CAP.	VEHICLE ID # (VIN)	MILEAGE	SERVICE
Chase 55	2013	Dodge	Grand Caravan	5	2C4RDGBG6DR765157	110,972	Wheelchair
Para 140	2020	Ford	Transit	6	1FBAX2C85LKA10243	141,827	Wheelchair
Para 150	2020	Ford	Transit T-350	6	1FDAX2C87LKA07917	131,499	Wheelchair
Para 160	2017	Ford	Transit	6	1FBZX2CM6KKA83183	121,729	Wheelchair
Para 180	2021	Ford	Transit T-350	6	1FBVU4XG4MKA80177	241,911	Wheelchair
Para 190	2015	Ford	Transit T-250	6	1FMZK1CMXFKA95536	128,511	Wheelchair
Para 210	2022	Ford	Transit T-350	6	1FDAX2C88NKA45451	71,950	Wheelchair
Para 220	2022	Ford	Transit T-350	6	1FDAX2C81NKA45100	76,100	Wheelchair
Para 230	2023	Ford	Transit T-350	6	1FDAX2C89PKA30587	91,897	Wheelchair
Para 240	2023	Ford	Transit T-350	6	1FDAX2C88PKA43637	157,987	Wheelchair
Para 260	2024	Ford	Transit T-250	6	1FDAX2C86RKA73187	44,708	Wheelchair
Para 270	2024	Ford	Transit T-250	6	1FDAX2C85RKA73777	79,897	Wheelchair
Para 330	2025	Ford	Transit	6	1FDAX2C82SKA74066	102,850	Wheelchair
Para 340	2025	Ford	Transit T-350	6	1FDAX2C83SKA74058	3,025	Wheelchair

UNIT #	YEAR	MAKE	MODEL	SEAT. CAP.	VEHICLE ID # (VIN)	MILEAGE	SERVICE
Para 370	2025	Ford	Transit	6	1FDAX2C81SKA74009	5,100	Wheelchair

Seating capacity shown is the total configured capacity including the driver; no vehicle exceeds the 15-passenger limit applicable to paratransit service. Mileage figures are current as of the filing date.

Item 7 — Vehicle Safety Program

Vehicle safety is managed under a written program directed by the Compliance Officer and supported by the Crew Manager and the applicant's contracted maintenance vendors.

(a) Periodic Vehicle Maintenance Plan

Every vehicle in paratransit service is subject to:

- Daily pre-trip and post-trip driver vehicle inspections, documented on a written or electronic Driver Vehicle Inspection Report (DVIR), with any defect identified, reported to dispatch, and corrected before the vehicle is returned to service;
- Scheduled preventive maintenance at mileage- and time-based intervals (oil and filter service, brake inspection, tire rotation and replacement, fluid checks, belts and hoses, suspension, and lift/ramp service for wheelchair-equipped units), tracked in the applicant's maintenance log;
- Annual Pennsylvania state safety inspection and, where applicable, emissions inspection, performed by a Commonwealth-certified inspection station;
- Out-of-cycle inspection and repair following any reported defect, accident, or unusual operating condition.

The applicant maintains an in-house fleet maintenance capability to ensure its vehicles are properly and consistently maintained. Routine maintenance, inspections, and repairs are performed primarily by qualified in-house personnel, with specialized work referred to contracted service providers as needed. All maintenance, inspection, and repair activity is documented in the vehicle file and retained in accordance with Commission record-retention requirements.

(b) Continuous Compliance with 67 Pa. Code, Chapter 175

The applicant's program is designed so that every paratransit vehicle continuously meets the equipment standards of 67 Pa. Code, Chapter 175. This is accomplished through (1) the daily DVIR, which surfaces defects in items required by Chapter 175 (lights, brakes, tires, mirrors, horn, wipers, glazing, fuel system, exhaust, and securement equipment) before each shift; (2) immediate out-of-service action for any vehicle with a defect affecting a Chapter 175 requirement, with no return to service until the defect is corrected and re-verified; (3) annual Pennsylvania safety inspection as an independent third-party verification of equipment

compliance; and (4) Compliance Officer review of inspection and maintenance records on a routine basis to identify trends and to confirm that no vehicle operates with an open Chapter 175 deficiency.

For wheelchair-accessible vehicles, securement systems (Qstraint or equivalent), lifts, ramps, and occupant restraints are subject to scheduled functional inspection and to the same out-of-service protocol upon any reported defect.

Item 8 — Insurance

The applicant currently maintains continuous commercial automobile liability, general liability, workers' compensation, and other coverages at limits at or above those required by the Commission for paratransit carriers, and has done so throughout its operating history under the existing certificate. Coverage is placed through a licensed commercial insurance broker experienced in paratransit and passenger transportation.

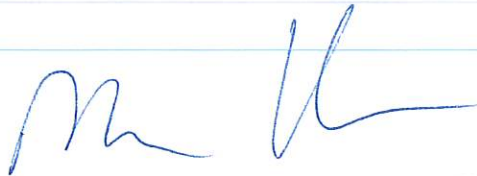
The applicant's existing insurance coverage extends throughout the Commonwealth of Pennsylvania and beyond. The proposed expanded service territory — Chester, Delaware, Montgomery, and Philadelphia Counties — therefore falls entirely within the applicant's current coverage footprint, and no gap in coverage results from the requested amendment. The applicant has the financial capacity to continue paying the required premiums on the same basis it currently does, and has determined that it can obtain and maintain all insurance required for the expanded authority.

Upon Commission approval of the amended authority, the applicant will cause its insurer to file the required Form E (or its successor) evidencing required coverage with the Commission's Bureau of Technical Utility Services.

The foregoing responses to Items 4 through 8 are submitted to supplement the application materials previously filed at Docket No. A-2016-2579059. The applicant remains in full compliance with all applicable Pennsylvania Public Utility Commission regulations governing insurance, safety, and operations.

Verification

The undersigned deposes and says that he is authorized to and does make this verification on behalf of Star Medical Transport Services LLC (d/b/a LifeMed), and that the facts set forth in the foregoing responses to Items 4 through 8 of the Verified Statement of Applicant are true and correct to the best of his knowledge, information, and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



5-18-26

Signature

Date

Maurice Williams, Owner and Chief Executive Officer

Star Medical Transport Services LLC, d/b/a LifeMed