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June 15, 2026

VIA E-FILING

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

Re: Application of Be Safe Transport, LLC
Docket No. A-2026-3062419

Dear Secretary Homsher:

Enclosed for electronic filing please find the Joint Protest of Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc., and Tri County Transit Service, Inc. in the above-captioned proceeding.

Copies are being served in accordance with the attached Certificate of Service. Please contact me with any questions or concerns.

Sincerely,
BUCHANAN INGERSOLL & ROONEY PC

By: 
Ezza Ahmed, Esquire

EA/psm
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Be Safe Transport, LLC for :
the right to expand authority to transport, as a :
common carrier, by motor vehicle, : Docket No. A-2026-3062419
individuals in paratransit service, from points :
in the Counties of Berks, Bucks, Chester, :
Lehigh, and Montgomery to points in :
Pennsylvania, and return. :

**JOINT PROTEST OF BUCKS COUNTY TRANSPORT, INC., BUX-MONT
TRANSPORTATION, INC., EASTON COACH COMPANY, SUBURBAN TRANSIT
NETWORK, INC., AND TRI COUNTY TRANSIT SERVICE, INC.**

Bucks County Transport, Inc. (“BCT”), Bux-Mont Transportation, Inc. (“Bux-Mont”), Easton Coach Company (“Easton”), Suburban Transit Network, Inc. (“TransNet”), and Tri County Transit Service, Inc. (“Tri County”) (collectively, the “Joint Protestants”), by and through their attorneys, hereby file this Joint Protest to the above-referenced Application pursuant to 52 Pa. Code §§ 3.381(c), 5.51, and state as follows:

I. INTRODUCTION / PROTESTANTS

1. BCT’s full name and address is:

Bucks County Transport, Inc.
Buckingham Green 2
PO Box 510
Holicong, PA 18928
215-794-5554

- Bux-Mont’s full name and address is:

Bux-Mont Transportation, Inc.
726 Fitzwatertown Rd.
Willow Grove, PA 19090
215-659-8865

Easton's full name and address is:

Easton Coach Company
1200 Conroy Place
Easton, PA 18040
610-252-8667

TransNet's full name and address is:

Suburban Transit Network, Inc.
Union Meeting Corporate Center
980 Harvest Drive, Suite 100
Blue Bell, PA 19422
215-542-7433

Tri County's full name and address is:

Tri County Transit Service, Inc.
110 Industrial Parkway
Sanatoga, PA 19464
610-495-5640

The name, address and telephone number of Joint Protestants' attorneys are:

Ezza Ahmed (PA I.D. #334307) (Primary Contact)
John F. Povilaitis (PA I.D. #28944)
Alan Michael Seltzer (PA I.D. #27890)
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john.povilaitis@bipc.com
alan.seltzer@bipc.com

The Joint Protestants request that all pleadings, correspondence and other documents in this matter be directed to their attorneys.

II. JOINT PROTESTANTS' INTEREST IN THE APPLICATION

2. BCT holds authority from the Pennsylvania Public Utility Commission ("PaPUC" or "Commission") to transport persons as a common carrier in paratransit service between points

in Bucks County and to points in the counties of Northampton, Lehigh, Montgomery and Philadelphia, and return. As a carrier in the paratransit industry operating where Be Safe Transport, LLC (“Applicant”) proposes to offer service, BCT has a substantial interest in ensuring that the public is served by carriers that have sufficient technical expertise, financial capacity and a propensity to operate safely and legally, as required by the Commission and applicable law. BCT currently holds PaPUC authority and operates under the following authorizations: Docket No. A-00107294, Folder 2, Am-C; Docket No. A-00107294.

3. Bux-Mont holds authority from the PaPUC to transport persons as a common carrier in paratransit service between points in Bucks County and to points in the counties of Montgomery and Philadelphia, and return. As a carrier in the paratransit industry operating where Applicant proposes to offer service, Bux-Mont has a substantial interest in ensuring that the public is served by carriers that have sufficient technical expertise, financial capacity and a propensity to operate safely and legally, as required by the Commission and applicable law. Bux-Mont currently holds PaPUC authority and operates under the following authorizations: Docket No. A-00087075, Folders 1, 2, 3, 4, 5, 6; Docket No. A-00087075, Folders 2, 3, 3 Am-A, 4; Docket No. A-00087075, Folders 5/A-2009-2123552, 5 Am-A; Docket No. A-00087075, Folder 6; Docket No. A-00087075, Folder 7.

4. Easton holds authority from the PaPUC to transport persons as a common carrier in paratransit service between points in the borough of Norristown, Montgomery County, between points in the borough of Norristown and within an airline distance of five (5) miles of the limits of the Borough of Norristown, and in the township of Whitemarsh, Montgomery County. As a carrier in the paratransit industry operating where Applicant proposes to offer service, Easton has a substantial interest in ensuring that the public is served by carriers that have sufficient technical

expertise, financial capacity and a propensity to operate safely and legally, as required by the Commission and applicable law. Easton currently holds PaPUC paratransit authority and operates under the following authorizations: Docket No. A-00118835/A-2014-2415540.

5. TransNet holds authority from the PaPUC to transport persons as a common carrier in paratransit service between points in Montgomery County and from points in Montgomery County to points in the counties of Chester, Delaware, Philadelphia and Bucks and return. As a carrier in the paratransit industry operating where Applicant proposes to offer service, TransNet has a substantial interest in ensuring that the public is served by carriers that have sufficient technical expertise, financial capacity and a propensity to operate safely and legally, as required by the Commission. TransNet currently holds PaPUC authority and operates under the following authorizations: Docket No. A-00102219, F.2; Docket No. A-00102219, F.1, Am-A.

6. Tri County holds authority from the PaPUC to transport persons as a common carrier in paratransit service between points in the borough of Pottstown, Montgomery County, and within an airline distance of fifteen (15) miles of the limits of the Borough of Pottstown. As a carrier in the paratransit industry operating where Applicant proposes to offer service, Tri County has a substantial interest in ensuring that the public is served by carriers that have sufficient technical expertise, financial capacity and a propensity to operate safely and legally, as required by the Commission and applicable law. Tri County currently holds PaPUC authority and operates under the following authorizations: Docket No. A-00112826, F.2.

7. Applicant has sought Commission authority to provide paratransit service in geographic territories that overlap with geographic areas in which the Joint Protestants currently provide paratransit service. Applicant has requested authority for a significant service territory in the Commonwealth of Pennsylvania that encompasses Bucks and Montgomery Counties. As such,

the Joint Protestants have a substantial interest in the outcome of this Application proceeding that will not be addressed by any other participant.

III. GROUNDS FOR PROTEST

8. As the proponent of an order seeking the issuance of a certificate of public convenience, Applicant carries the burden of proof. 66 Pa.C.S. § 332(a). Applicant has not made a sufficient and adequate showing that it possesses, or is likely to possess, sufficient technical and financial ability to allow the Commission to find or determine that granting a certificate of public convenience to Applicant is necessary or proper for the service, accommodation, convenience or safety of the public pursuant to Section 1103(a) of the Public Utility Code. 66 Pa.C.S. § 1103(a). In addition, Applicant has not made a sufficient and adequate showing that it is likely to operate safely when providing paratransit service.

9. On the issue of **technical fitness**, Applicant has made no showing that its principals or drivers possess sufficient expertise and experience to serve the proposed territory. Applicant has identified only two principals and has not identified any employees, including dispatchers, who will be responsible for the conduct of the business that could take place throughout portions of Pennsylvania. Applicant purports to be prepared to evaluate drivers for their fitness and both train and test prospective drivers but has offered no support that individuals qualified to provide such evaluation, training and testing are part of the business.

10. Applicant fails to provide the number of drivers it intends to use or hire in its proposed expanded service territory, as well as how that number is adequate for the service territory requested. This omission renders the Application inadequate from a technical fitness standpoint.

11. Applicant indicates it will commence business with five (5) vehicles but has failed to explain as required by the Commission's Application at ¶6 of the "Verified Statement of Applicant" how it plans to use the vehicles that it currently has registered in its name in the business and how they are appropriate to provide reasonable and efficient service to the large service territory it proposes to serve.

12. Applicant purports to have transportation experience but provides no documentation to support its experience.

13. Applicant has not demonstrated that it is sufficiently familiar with Pennsylvania Department of Transportation vehicle equipment inspection standards in order to ensure the Commission that the applicable standards are and will be met at all times when its vehicles are operated as required by Commission regulations. 52 Pa. Code § 29.402(1). Therefore, Applicant has not demonstrated that it will have a propensity to operate safely.

14. The Applicant indicates its vehicles are covered by insurance, but there are no insurance details identified in the Application. Applicant has not, therefore, demonstrated it can obtain insurance and pay the required premiums as requested in the Commission's "Verified Statement of Applicant" at ¶8.

15. Applicant has failed to provide evidence demonstrating that paratransit services may be provided safely in that the application does not specifically indicate how its vehicles are equipped for the safe access and transport of persons in wheelchairs/stretchers appropriate to paratransit service.

16. Applicant has failed to present evidence demonstrating that paratransit services may be provided safely, as the vehicle(s) relevant to paratransit services proposed to be used by Applicant is/are **19-23** years old, which exceeds the Commission's ten-year age limit for call or

demand service pursuant to 52 Pa. Code § 29.314(c). Further, at least three (3) of the vehicles listed lack confirmed mileage information. Although that regulation applies to call or demand service and not specifically to paratransit service, it is a logical guideline for safety.

17. Applicant indicates it plans to transport individuals in wheelchairs but has not substantiated if its vehicles are equipped with the medical or handicap devices appropriate to paratransit service.

18. Applicant has failed to provide a sufficient description of its facilities, including a description of its physical location and the facility which will be utilized to house the significant number of vehicles identified in Application, as required by the Commission's Application at ¶4 of the "Verified Statement of Applicant."

19. Applicant has failed to describe its record maintenance plan, including both its plan to maintain records required by the Commission at 52 Pa. Code § 29.111, as well as normal business records, as required by Application at ¶4 of the "Verified Statement of Applicant."

20. The Commission's Policy Statement on the evidentiary criteria used to decide motor carrier applications states that Applicant has the burden to demonstrate compliance with fitness standards, including "[w]hether an applicant has sufficient capital, equipment, facilities and other resources necessary *to serve the territory requested.*" 52 Pa. Code § 41.14(1) (emphasis added). Applicant possesses five (5) vehicles, all of which are 10 years or older. Those vehicles exceed the Commission's ten-year age limit for call or demand service pursuant to 52 Pa. Code § 29.314(c). Although that regulation applies to call or demand service and not specifically to paratransit service, it is a logical guideline for safety. Should Applicant commence business with the listed older vehicles, this is inadequate for the six-county service territory requested. Further, Application does not specifically indicate how any of the vehicles are equipped with the medical

or handicap devices for the safe access and transport of persons in both wheelchairs and stretchers appropriate to paratransit service.

21. Applicant has not identified any employees, including dispatchers, who will be responsible for the conduct of the business that could take place throughout a substantial portion of Pennsylvania. The Commission's Policy Statement on the evidentiary criteria used to decide motor carrier applications states that Applicant has the burden to demonstrate compliance with fitness standards, including "[w]hether an applicant has sufficient capital, equipment, facilities and other resources necessary to serve the territory requested." 52 Pa. Code § 41.14(1) (emphasis added). In fact, Applicant fails to show a presence throughout the entire Commonwealth to serve the territory requested as Applicant has only one facility located in Delaware County.

22. Applicant purports to have policies in place for a driver training program to evaluate drivers for their fitness and to train and test prospective drivers but provides insufficient details on the training program. Applicant has offered no support that those individuals are qualified to provide such evaluation, training and testing are part of the business. Applicant has failed to explain how drivers will be trained to safely transport and escort paratransit passengers. These omissions indicate that Applicant lacks the technical fitness to operate in paratransit and cannot demonstrate that it is likely to operate safely when providing service.

23. Applicant has also failed to provide sufficient evidence of **financial fitness**. There is no indication Applicant is prepared to follow generally accepted accounting principles in its record keeping, as required by the Commission. 52 Pa. Code § 29.41(a). There is no indication the business will have sufficient liquidity in the form of a line of credit, sufficient cash or other funding sources available to cover the reasonable and customary costs of operating its proposed service. The adequacy of the identified business assets cannot be evaluated and found sufficient because

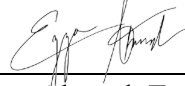
no business expenses have been estimated. Applicant has provided no information in the Application indicating it has taken into account normal business expenses, such as the cost of vehicles, vehicle maintenance expense, marking of vehicles or salaries of drivers. Nor has any projection of likely income from the paratransit service business been provided. Further, the financial materials submitted are inconsistent, showing significant discrepancies in the financial assets purported to be available to Applicant.

24. The grounds for Protest are not limited to the above but are by way of example. Protestants reserve the right to supplement the basis for this Protest as information is developed.

WHEREFORE, for all the foregoing reasons, the Joint Protestants respectfully request that they be granted full party status in this proceeding as Protestants and, absent a resolution of this proceeding in the next sixty (60) days, that hearings be scheduled so that the Commission may develop an evidentiary record concerning the issues raised in this Joint Protest, and that the Application of Be Safe Transport, LLC be denied.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC



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Alan M. Seltzer, Esquire
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john.povilaitis@bipc.com
alan.seltzer@bipc.com

Attorneys for Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc. and Tri County Transit Service, Inc.

Dated: June 15, 2026

VERIFICATION

I, James A. Raymond, certify that I am Chief Financial Officer of Bucks County Transport, Inc., and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that Bucks County Transport, Inc. expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.



James A. Raymond, CFO
Bucks County Transport, Inc.

DATED: June 15, 2026

VERIFICATION

I, R. Samuel Valenza, certify that I am President and Chief Executive Officer of Bux-Mont Transportation, Inc., and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that Bux-Mont Transportation, Inc. expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.



R. Samuel Valenza, President & CEO
Bux-Mont Transportation, Inc.

DATED: June 15, 2026

VERIFICATION

I, Mark Glatz, certify that I am Executive Vice President of Easton Coach Company, and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that Easton Coach Company expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.

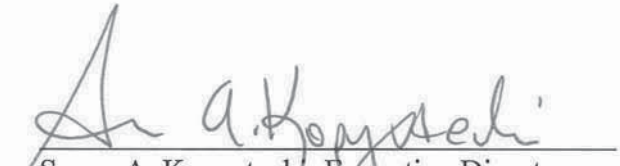


Mark Glatz, EVP
Easton Coach Company

DATED: June 15, 2026

VERIFICATION

I, Susan A. Kopystecki, certify that I am Executive Director of Suburban Transit Network, Inc., and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that Suburban Transit Network, Inc. expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.


Susan A. Kopystecki, Executive Director
Suburban Transit Network, Inc.

DATED: June 15, 2026

VERIFICATION

I, James P. Tammaro, certify that I am General Manager of Tri County Transit Service, Inc., and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that Tri County Transit Service, Inc. expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.

A handwritten signature in black ink, appearing to read 'J.P.T.', is written over a horizontal line.

James P. Tammaro, General Manager
Tri County Transit Service, Inc.

DATED: June 15, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Be Safe Transport, LLC for :
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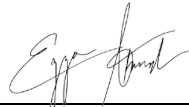
CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing document upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email and Regular Mail:

Raymond Bastein
1126 Brand Street
Collingdale, PA 19023
besafetransportvee@gmail.com

Date: June 15, 2026



Ezza Ahmed