

Executive Transportation Co., Inc
8125 Frankford Ave
Philadelphia, PA 19136
215-333-3333
215-333-3133-fax
Email: AcademyRadio@msn.com



Rosemary Chiavetta, Secretary
PA PUC
400 North Street, 2nd Floor
Harrisburg, PA 17120

April 3, 2015

Reference: C-2015-2425319, Executive Transportation Company t/a Luxury Sedan Service (ETC)

Dear Mrs. Secretary,

I have received the Complaint dated March 27, 2015, with the above referenced Docket No. Please see my response below.

1. Admitted.
2. Admitted.
3. Denied. Respondent denies that it has a website at the web address at www.allthrees.com. This website is owned and operated by Yellow Cab Inc. (YC), a Pennsylvania corporation and a dispatch company. YC owns and utilizes the trade name Allthrees, which fictitious name is properly registered with the Pennsylvania Department of State. YC provides dispatch services for ETC, just as it does for numerous taxi companies including Yellow Taxicabs of Philadelphia, Bucks County Services, Inc., and BM Enterprises, Inc., t/a A&G Taxi. From time to time, YC may advertise its services by making reference to those licensed carriers for which it provides dispatch services.

In reference to the allegation that Officer Bianco observed a receipt issued by the Respondent, said receipt was not attached to the Complaint, and, absent proof, this allegation must be denied. By way of further answer only, YC, incident to its digital dispatch services, provides standardized digital printing for all carriers utilizing its services. As such, for the safety and convenience of riders, the receipts are labeled with YC's trade name and contact information along with the vehicle number of the particular taxicab or limousine, driver identification, the date and time of pick-up/drop-off and credit card information (if credit card payment is used). This information is automatically generated, and it cannot be altered by drivers.

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Since YC has reservationists 24 hours a day, if there is a complaint, YC can process said complaint at any time. If YC cannot for any reason handle a complaint for a particular carrier, they can then forward to them. This allows a customer to receive a response immediately, whereas that particular carrier may not have someone available to process the inquiry at the time of the call.

Requests for service may be made either by calling its reservation center, its website, or through its Mobile Application. Because YC, has numerous Carriers and a diverse platform to receive and dispatch said requests, its dispatch platform and equipment is standardized to ensure efficiency and consistency for its Carriers and Riders. To avoid any confusion on the Riders behalf, or the false assumption they are being given the "run around" by giving them different numbers other than the one they called to place the order, or have associated with the service they received, YC processes and forwards any questions and/or complaints to the respective Carrier in question.


The PUC does not regulate the provision of dispatch services, and there are no prohibitions on using these services.

4. Denied. 52 PA. Code §3.381(a)(6)(ii) specifically deals with requirements when and if a Carrier changes its name. Executive Transportation Company has neither changed its name nor adopted a new fictitious name, as described above. Moreover, the cited regulation has nothing to do with advertisements and if for all of these reasons wholly inapplicable.

ETC finds this Complaint ironic to the extent of the Temporary Authority it has granted to the Transportation Network Providers (TNCs). The Commission has effectively destabilized the livery industry by allowing TNCs to operate under a different and less rigorous set of regulations. Uber, for example, engages in precisely the complained of conduct. Uber dispatches hundreds, if not thousands, of purportedly independent, non-commercial vehicles to provide for-hire transportation. Additionally, the licensed/certificated carriers that they do dispatch to, the vast majority, if not all of them do not have a properly filed tariff with this Commission, granting them the Right(s) to charge by the methodology that Uber's app utilizes. Like YC, Uber provides standardized receipts. Unlike YC, however, Uber does not even print any direct contact numbers on their receipts. You must email them and wait for a response. When and if they do respond, most likely, you will have to wait again while they determine what, if any information they are going to provide you.

I hope this clarifies this issue and if you have any further questions or concerns please let me know.

Respectfully,

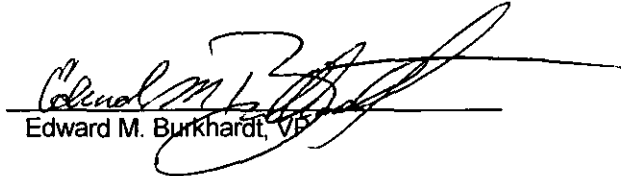

Edward M. Burkhardt
VP

CC: Wayne T. Scott, Prosecutor, by email @ RA-PCCmplntResp@pa.gov

VERIFICATION

I, Edward M. Burkhardt, 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 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 falsifications to authorities.

Date: 4/7/15


Edward M. Burkhardt, VP

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DATE OF DELIVERY SPECIFIED*



USPS TRACKING™ INCLUDED*



INSURANCE INCLUDED*



PICKUP AVAILABLE

* Domestic only

WHEN USED INTERNATIONALLY,
A CUSTOMS DECLARATION
LABEL MAY BE REQUIRED.

FROM:

8125 Frankford ave
Phila : PA 19136

TO:

PA PUC
400 North street
2nd floor
Harrisburg PA 17120
ATTN: sec. Chiquetta



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