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April 16, 2015

VIA ELECTRONIC FILING

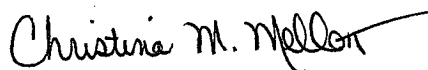
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Application of Century Medical Response, Inc.; Docket No. A-2015-2465681

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Protest and Request for Oral Hearing of the Protestant, *Trans-Med Ambulance, Inc.* regarding the above-referenced Application. As evidenced by the attached Certificate of Service, this filing has been served on the Applicant pursuant to the Commission's rules and within the required time frame. Please let us know if you have any questions regarding this matter.

Very truly yours,



Christina M. Mellott
for PAGE, WOLFBERG & WIRTH, LLC

CMM:ms
Enclosures

cc: Century Medical Response, Inc.
Trans-Med Ambulance, Inc.

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: APPLICATION OF :
CENTURY MEDICAL : Docket No. A-2015-2465681
RESPONSE, INC. :

PROTEST AND REQUEST FOR ORAL HEARING

In accordance with the Rules of Practice of the Pennsylvania Public Utility Commission, the motor carrier, Trans-Med Ambulance, Inc. (hereinafter referred to as "Protestant"), protests the above Application and requests that the Application be assigned for oral hearing and in support thereof respectfully represents as follows:

1. By this Application, notice of which was published in the Pennsylvania Bulletin on April 11, 2015, Century Medical Response, Inc. ("Applicant") seeks authority as set forth in Appendix A.

2. The name, address and telephone number of counsel for the Protestant set forth in this Protest and Request for Oral Hearing is:

Christina Mellott, Esq.
PAGE, WOLFBERG & WIRTH, LLC
5010 East Trindle Road, Suite 202
Mechanicsburg, PA 17050
(717) 691-0100

3. The name, address and telephone number of the Protestant set forth herein is:

TRANS-MED AMBULANCE, INC.
14 Marion St
Luzerne, PA 18709-1419
(570) 283-2444

4. Protestant, Trans-Med Ambulance, Inc., holds authority from the Commission at Docket A-00122824, as follows:

To transport, as a common carrier, persons in paratransit service, between points in the counties of Lackawanna, Luzerne, Monroe and Wyoming.

A true and correct copy of the Certificate of Public Convenience, evidencing this above-described authority held by Protestant, Trans-Med Ambulance, Inc., is attached hereto as Appendix B.

5. Approval of this Application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since: (a) the Protestant presently holds authority to provide service in the area affected by the Application prior to any resolution of the Application; (b) the Protestant and other existing carriers are providing adequate service to the public in the area involved in the Application; (c) the Protestant is presently provided the services proposed by the Applicant throughout the entire service area proposed by the Applicant; (d) there is no need for the service proposed by the Applicant and approval of the Application will result in the diversion from existing carriers of revenue necessary to sustain their existing operations; and (e) approval of the Application will adversely affect the Protestant and other existing carriers which have a substantial investment in facilities and equipment and are willing and able to provide service in the Application area.

6. Protestant requests that the Application be set for oral hearing and that the Applicant be required to prove by competent evidence the elements of proof required by statute and regulation. If an oral hearing is held, the Protestant will appear and present evidence of the Protestant's own operations and particular interests.

7. Pursuant to Section 333(c) of the Public Utility Code (66 Pa. C.S.A. § 333(c)), the Protestant hereby requests a list of witnesses expected to testify in the above-

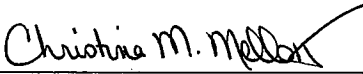
titled proceeding, together with the subject matter of their anticipated testimony, and, in particular, any complaints or any evidence pertaining to the service of the Protestant.

8. The Protestant knows of no amendments that would satisfy its interests in this proceeding.

WHEREFORE, the Protestant, Trans-Med Ambulance, Inc., requests that the granting of the Application be withheld; the proceeding be assigned for oral hearing with leave to the Protestant to participate fully therein; and that the Applicant be required to make available at the hearing competent witnesses for examination on all material and relevant facts bearing on the Application.

Respectfully submitted,

Dated: April 16, 2015



Christina M. Mellott, Esquire
Attorney I.D. No. 81369

PAGE, WOLFBERG & WIRTH, LLC
5010 East Trindle Road, Suite 202
Mechanicsburg, PA 17050
(717) 691-0100; (717) 691-1226 (fax)

Counsel for Protestant, Trans-Med Ambulance, Inc.

APPENDIX A

A-2015-2465681. Century Medical Response, Inc.
(P.O. Box 773, Wilkes-Barre, Luzerne County, PA
18703) persons in paratransit service, limited to
nonambulatory persons requiring wheelchair or
stretcher vehicle services, to or from medical
appointments, between points in Luzerne County.

**PENNSYLVANIA BULLETIN
VOLUME 45, NUMBER 15
APRIL 11, 2015**

APPENDIX A

APPENDIX B

PENNSYLVANIA
PUBLIC UTILITY COMMISSION

IN THE MATTER OF THE APPLICATION OF: A-00122824

Trans-Med Ambulance, Inc.

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval to operate.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 19th day of September, 2006.



James J. McKeel
Secretary

**CERTIFICATE OF
SERVICE**

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: APPLICATION OF :
 CENTURY MEDICAL : Docket No. A-2015-2465681
 RESPONSE, INC. :

CERTIFICATE OF SERVICE

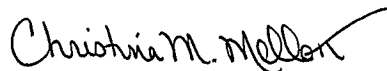
I hereby certify that I have this day served a true copy of the foregoing Protest and Request for Oral Hearing upon the Applicant listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant). This Protest and Request for Oral Hearing was electronically filed with the Commission on this day.

VIA FIRST CLASS MAIL

Century Medical Response, Inc.
P.O. Box 773
Wilkes-Barre, PA 18703

Applicant, Century Medical Response, Inc.

Dated this 16th day of April, 2015.



Christina M. Mellott
Attorney I.D. No. 81369
PAGE, WOLFBERG & WIRTH, LLC
5010 East Trindle Road, Suite 202
Mechanicsburg, PA 17050
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Counsel for Protestant, Trans-Med Ambulance, Inc.