

**H**awke  
  **M**cKeon &  
   **S**niscak LLP  
**ATTORNEYS AT LAW**

Steven K. Haas  
717 236-1300 x244  
[skhaas@hmslegal.com](mailto:skhaas@hmslegal.com)

---

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

April 21, 2015

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

RE: Call or Demand Application of Dominicana Taxi Express, LLC;  
Docket No. A-2015-2471494; Protest of Michael Richard Grab t/d/b/a  
Grab-A-Cab

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission is the Protest of Michael Richard Grab t/d/b/a Grab-A-Cab ("Grab-A-Cab") to the above-referenced application. A copy of this Protest was served on the Applicant in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. Please contact me with any questions you may have.

Sincerely,



Steven K. Haas  
*Counsel to Grab-A-Cab*

SKH/jld

Enclosure

cc: Michael R. Grab  
Pedro E. Ramirez

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Dominicana Taxi Express, LLC

:  
:  
:

Docket No. A-2015-2471494

---

**PROTEST OF  
MICHAEL RICHARD GRAB t/d/b/a  
GRAB-A-CAB**

---

NOW COMES Michael Richard Grab t/d/b/a Grab-A-Cab (“Grab-A-Cab”) and files, pursuant to 52 Pa. Code §3.381(c), this Protest to the above-captioned application. In support thereof, Grab-A-Cab represents as follows:

1. The name of the Applicant and the Docket No. assigned to the application are:

Dominicana Taxi Express, LLC  
Docket No. A-2015-2471494

2. The name, business address and telephone number of the Protestant are:

Michael Richard Grab t/d/b/a Grab-A-Cab  
160 Water Street  
Reading, PA 19605  
(610) 698-5825

3. The name, business address, telephone number and e-mail address of the Protestant’s attorney are:

Steven K. Haas  
Hawke McKeon & Sniscak, LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
(717) 236-1300  
[skhaas@hmslegal.com](mailto:skhaas@hmslegal.com)

4. Grab-A-Cab holds Pennsylvania Public Utility Commission (“Commission”) call or demand authority under Docket No. A-00112718. A copy of the company’s Certificate of Public Convenience is attached hereto as Appendix A.

5. Grab-A-Cab is authorized to provide call or demand service in the city of Reading, Berks County, Pennsylvania. The Applicant is seeking authority to provide call or demand service in the city of Reading, Berks County, Pennsylvania. Accordingly, the territory in which Grab-A-Cab is authorized to serve is the same as the territory sought by the Applicant in this proceeding. Approval of the instant application is neither necessary nor proper for the service, accommodation, convenience or safety of the public, since (a) Grab-A-Cab currently holds authority to provide call or demand service in the same territory sought in the application, (b) Grab-A-Cab and other existing carriers are providing adequate service to the public in the territory at issue, (3) there is no need for the service proposed by the Applicant, and (4) approval of the application may result in destructive competition and the diversion from existing carriers of revenue necessary to sustain current operations, thereby harming the public. Further, the information included in the application is insufficient to allow for an evaluation of the Applicant’s technical, financial and legal fitness to provide the service requested in the territory sought. Accordingly, the Applicant may not possess the requisite fitness to provide the service sought in the application.


6. Grab-A-Cab 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.

7. Grab-A-Cab is unaware of any potential settlement terms that will satisfy its interests.

WHEREFORE, Grab-A-Cab requests that (1) the granting of the instant application be withheld, (2) the proceeding be assigned for oral hearing with leave for Protestant to participate fully therein, and (3) the Applicant be required to present at hearing competent witnesses for examination on all material and necessary facts bearing of this application.

Respectfully submitted,

Michael Richard Grab t/d/b/a Grab-A-Cab

By:   
\_\_\_\_\_  
Steven K. Haas  
*Counsel for Grab-A-Cab*

DATED: April 21, 2015

**APPENDIX A**

**CERTIFICATE OF PUBLIC CONVENIENCE**

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION

IN THE MATTER OF THE APPLICATION OF: A-00112718

Michael Richard Grab, trading and doing business as GRAB-A-CAB

*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 of the right to operate as a common carrier.*

*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 25th day of APRIL, 1996.*



*John H. Afford*

Secretary

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Dominicana Taxi Express, LLC

:  
:  
:

Docket No. A-2015-2471494


**CERTIFICATE OF SERVICE**

I hereby certify that I have served on this date the foregoing Protest of Michael Richard Grab t/d/b/a Grab-A-Cab on the persons and in the manner identified below:

**VIA FIRST CLASS MAIL**

Pedro E. Ramirez  
1313 Moss Street  
Reading, PA 19604  
*Owner, Dominicana Taxi Express, LLC*

DATED: April 21, 2015

  
\_\_\_\_\_  
Steven K. Haas