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April 21, 2015

**FILED ELECTRONICALLY**

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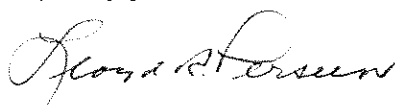
**Re: Application of Century Medical Response, Inc.  
A-2015-2465681**

Secretary  
PA Public Utility Commission  
2<sup>nd</sup> Floor, Commonwealth Keystone Building  
Harrisburg, PA 17110

Dear Sir or Madam:

We file herewith on behalf of MTR Transportation, Inc. t/d/b/a K-Cab Co., Protestant, its original Protest to this Application.

Very truly yours,



Lloyd R. Persun

LRP:pg  
Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In Re: : A-2015-2465681  
:   
Application of Century Medical Response, :   
Inc. : **FILED ELECTRONICALLY**

PROTEST OF MTR TRANSPORTATION, INC. t/d/b/a K-CAB CO.

AND NOW, this 21<sup>st</sup> day of April, 2015, MTR TRANSPORTATION, INC.,  
t/d/b/a K-CAB CO., Protestant, by its attorneys, files this Protest to this Application and in  
support thereof avers as follows:

1. The name, address and telephone number of Protestant are:

MTR Transportation, Inc.  
t/d/b/a K-Cab Co.  
P.O. Box 274  
Mifflinville, PA 18631  
(570) 784-1550

2. The name, address and telephone number of Protestant's attorneys are:

Lloyd R. Persun, Esquire  
Persun & Heim, P.C.  
P.O. Box 659  
Mechanicsburg, PA 17055-0659  
(717) 620-2440

3. Protestant possesses authority at A-00116855 and various folders and amendments thereunder with which the Application conflicts. Protestant's said operating authority is described on Exhibit "A" attached hereto and made a part hereof.

4. To the extent of such conflict there is no need or immediate need for the service which is proposed in the Application (the "proposed service").

5. No need or immediate transportation need exists. Protestant has not discontinued any service or failed to provide service within its operating authority. Protestant has not refused any request for service. Protestant is able and willing to provide equipment necessary to meet existing transportation needs. Protestant is ready, willing and able to provide service to the public.

6. Approval of the Application is not necessary or proper for the accommodation, service, necessity or safety of the public. Applicant is not fit to provide the proposed service.

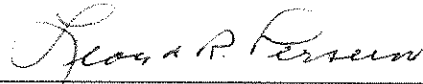
7. Entry of a new carrier into the area of conflict between the proposed service and Protestant's operating authority will impair the operations of existing carriers including Protestant.

8. Protestant is not aware of a Restrictive Amendment which would satisfy its interest. However, Protestant is willing to discuss the possibility of a Restrictive Amendment with Applicant, if Applicant so desires.

WHEREFORE, Protestant respectfully requests that the Application be dismissed with prejudice or, in the alternative, that the Application be scheduled for hearing as on-the-

record proceeding and that Protestant be permitted to participate in that proceeding as a party.

Respectfully submitted,



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Lloyd R. Persun, Esquire  
Persun & Heim, P.C.  
P.O. Box 659  
Mechanicsburg, PA 17055-0659  
(717) 620-2440  
Attorneys for MTR Transportation, Inc.,  
t/d/b/a K-Cab Co.  
Protestant

**A-00116855, Folder 2. MTR Transportation, Inc., t/d/b/a K-Cab Co.** (6725 Keefers Lane, Bloomsburg, Columbia County, PA 17815), a corporation of the Commonwealth of Pennsylvania--additional right--(1) persons, in paratransit service, between points in the town of Bloomsburg, the borough of Catawissa, and the townships of Montour, Hemlock, Franklin, Catawissa, Mt. Pleasant, Scott, Main, Greenwood and Madison, Columbia County, and the borough of Danville and the townships of Cooper, Derry, Mahoning, Valley and West Hemlock, Montour County, and the borough of Riverside, Northumberland County, and from points in said town, boroughs and townships to points in Pennsylvania, and return; subject to the following condition: that the service herein authorized shall be rendered without the use of domelights or taximeters; and (2) persons, in paratransit service, between points in Columbia County and the township of Salem, Luzerne County, and from points in said county and township, to points in Pennsylvania, and return.

**A-00116855, Folder 3. MTR Transportation, Inc., t/d/b/a K-Cab Co.** (6725 Keefers Lane, Bloomsburg, Columbia County, PA 17815), a corporation of the Commonwealth of Pennsylvania--additional right--persons, upon call or demand; (1) in the town of Bloomsburg, Columbia County; (2) in the townships of Montour, Hemlock, Franklin, Catawissa, Mt. Pleasant, Scott and Main, Columbia County; (3) in the borough of Catawissa, Columbia County; (4) in the borough of Berwick, Columbia County, and within an airline distance of 15 statute miles of the limits of said borough; (5) the township of Cooper and Mahoning, Montour County; (6) in the borough of Danville, Montour County; and (7) in the borough of Riverside, Northumberland County.

**A-00116855. MTR Transportation, Inc., t/d/b/a K-Cab Co.** (6725 Keefers Lane, Bloomsburg, Columbia County, PA 17815), a corporation of the Commonwealth of Pennsylvania--additional right--as a common carrier, property excluding household goods and use between points in Pennsylvania.

CERTIFICATE OF SERVICE

I, Lloyd R. Persun, Esquire, hereby certify that a copy of the foregoing Protest was served on April 21, 2015 by United States mail, first class, postage prepaid, upon the following addressed as follows:

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



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Lloyd R. Persun, Esquire  
Attorney for MTR Transportation, Inc.  
t/d/b/a K-Cab Co.