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File #: 162179

April 27, 2015

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Century Medical Response, Inc. for the Right to Begin to Transport, as a Common Carrier, by Motor Vehicle, Persons in Paratransit Service, Limited to Nonambulatory Persons Requiring Wheelchair or Stretcher Vehicle Services, to or from Medical Appointments, Between Points in Luzerne County - Docket No. A-2015-2465681

Dear Secretary Chiavetta:

Enclosed for filing please find the Protest of Scranton Quincy Ambulance, LLC, t/a Wayne Ambulance, Lackawanna Ambulance, and Commonwealth Health Emergency Medical Services to the Application of Century Medical Response, Inc. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'DTR', is written over a horizontal line.

Devin T. Ryan

DTR/jl
Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

VIA FIRST CLASS MAIL

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

Christina M. Mellott
Page, Wolfberg & Wirth LLC
5010 East Trindle Road, Suite 202
Mechanicsburg, PA 17050
Attorney for Trans-Med Ambulance, Inc.

Lloyd R. Persun, Esquire
Persun & Heim, P.C.
P.O. Box 659
Mechanicsburg, PA 17055-0659
*Attorney for MTR Transportation, Inc.,
t/d/b/a K-Cab Co.*

Date: April 27, 2015



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Century Medical	:	
Response, Inc. for the Right to Begin to	:	
Transport, as a Common Carrier, by	:	
Motor Vehicle, Persons in Paratransit	:	
Service, Limited to Nonambulatory	:	Docket No. A-2015-2465681
Persons Requiring Wheelchair or	:	
Stretcher Vehicle Services, to or from	:	
Medical Appointments, Between Points	:	
in Luzerne County	:	

**PROTEST OF SCRANTON QUINCY AMBULANCE, LLC,
T/A WAYNE AMBULANCE, LACKAWANNA AMBULANCE, AND
COMMONWEALTH HEALTH EMERGENCY MEDICAL SERVICES
TO THE APPLICATION OF CENTURY MEDICAL RESPONSE, INC.**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Scranton Quincy Ambulance, LLC, t/a Wayne Ambulance, Lackawanna Ambulance, and Commonwealth Health Emergency Medical Services (“Scranton Quincy Ambulance”) hereby files this Protest to the Application of Century Medical Response, Inc. (“Century Medical Response”) for the Right to Begin to Transport, as a Common Carrier, by Motor Vehicle, Persons in Paratransit Service, Limited to Nonambulatory Persons Requiring Wheelchair or Stretcher Vehicle Services, to or from Medical Appointments, Between Points in Luzerne County (“Protest”) pursuant to Sections 3.381(c) and 5.51 through 5.53 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code §§ 3.381(c), 5.51-5.53, and the Commission’s Notice published in the Pennsylvania Bulletin on April 11, 2015, at 45 Pa.B. 1917.

If the Commission grants Century Medical Response's Application, it will negatively affect the service and operations of Scranton Quincy Ambulance, which is an existing paratransit service provider in Luzerne County. Furthermore, Century Medical Response has failed to demonstrate that: (1) approval of its Application will serve a useful public purpose, responsive to a public demand or need; and (2) Century Medical Response has the proper technical and financial fitness to provide the proposed service. In support of its Protest, Scranton Quincy Ambulance states as follows:

1. The name, business address, and telephone number of Scranton Quincy Ambulance are as follows:

Scranton Quincy Ambulance, LLC,
t/a Wayne Ambulance, Lackawanna Ambulance, and
Commonwealth Health Emergency Medical Services
1000 Remington Avenue
Scranton, PA 18505
Telephone: 570-207-5200

2. The names, business address, and telephone number of Scranton Quincy Ambulance's attorneys are as follows:

Michael W. Hassell, Esquire
Devin T. Ryan, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Telephone: 717-731-1970

3. Scranton Quincy Ambulance is a certificated common carrier by motor vehicle authorized to provide paratransit service in the counties of Lackawanna, Luzerne, Monroe, Pike, Susquehanna, Wayne, and Wyoming, to points in Pennsylvania, and return pursuant to Order of the Commission at Docket Nos. A-6415955, A-2013-2380146. *See Application of Scranton Quincy Ambulance, LLC, t/a Wayne Ambulance and Lackawanna Ambulance, a Limited Liability*

Company of Delaware, for the Right to Begin to Transport, by Motor Vehicle, in Paratransit Service, which Is to Be a Transfer of All Rights Authorized Under the Certificates Issued at A-00119245, F.3 and A-2011-2262613 to American Eagle Bus & Limo, Inc., Subject to the Same Rights and Limitations, Docket Nos. A-6415955, A-2013-2380146 (Order Entered Apr. 3, 2014).

A copy of Scranton Quincy Ambulance's certificate of public convenience is attached hereto as

Appendix A.

4. Scranton Quincy Ambulance is based out of Scranton, Pennsylvania. As indicated above, Scranton Quincy Ambulance is certificated to provide paratransit service in Luzerne County, which is the same county in which Century Medical Response seeks to provide paratransit service in its Application. Scranton Quincy Ambulance's service encompasses wheelchair van and other paratransit services that include the service proposed by Century Medical Response.

5. If the Commission grants Century Medical Response's Application, Century Medical Response would attempt to draw business from a portion of Scranton Quincy Ambulance's service territory. Consequently, Scranton Quincy Ambulance could lose service and revenues, resulting in an adverse financial impact on Scranton Quincy Ambulance. Therefore, approval of Century Medical Response's Application could endanger or impair Scranton Quincy Ambulance's existing operations to the extent that, on balance, the Commission's granting of authority to Century Medical Response may be contrary to the public interest. *See* 52 Pa. Code § 41.14(c).

6. Century Medical Response also has failed to demonstrate that approval of its Application will serve a useful public purpose, responsive to a public demand or need. *See* 52 Pa. Code § 41.14(a).

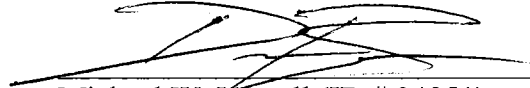
7. In addition, Century Medical Response has failed to demonstrate that it possesses the requisite technical and financial fitness to provide the proposed service or that it has a propensity to operate safely and legally. *See* 52 Pa. Code § 41.14(b).

8. Presently, Scranton Quincy Ambulance is unaware of any restrictions to Century Medical Response's Application that would protect Scranton Quincy Ambulance's interests. However, Scranton Quincy Ambulance remains willing to discuss possible restrictions to the Application with Century Medical Response that would address Scranton Quincy Ambulance's concerns.

9. Scranton Quincy Ambulance requests that the Application be set for oral hearing and that Century Medical Response be required to prove the requisite elements required by the Pennsylvania Public Utility Code and the Commission's regulations.

WHEREFORE, Scranton Quincy Ambulance, LLC, t/a Wayne Ambulance, Lackawanna Ambulance, and Commonwealth Health Emergency Medical Services respectfully requests that the Application of Century Medical Response, Inc. be denied.

Respectfully submitted,



Michael W. Hassell (ID # 34851)

Devin T. Ryan (ID # 316602)

Post & Schell, P.C.

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Harrisburg, PA 17101-1601

Phone: 717-731-1970

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E-mail: mhassell@postschell.com

dryan@postschell.com

Of Counsel:

Post & Schell, P.C.

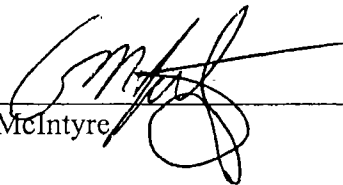
Date: April 27, 2015

Attorneys for Scranton Quincy Ambulance, LLC,
t/a Wayne Ambulance, Lackawanna Ambulance,
and Commonwealth Health Emergency Medical
Services

VERIFICATION
Docket No. A-2015-2465681

I, Gary McIntyre, Director of Operations of Scranton Quincy Ambulance, LLC, t/a Wayne Ambulance, Lackawanna Ambulance, and Commonwealth Health Emergency Medical Services, 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 a 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 falsification to authorities).

Date: 4-23-15



Gary McIntyre