

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA. P.U.C.
SECRETARY'S BUREAU

IN RE:

APPLICATION OF

A-2015-2469125

GRANNY'S HELPING HANDS PA, INC. T/A LET'S GO TRANSPORTATION, LLC

Application for the right to transport, by motor vehicle, persons, upon call or demand in the Counties of Delaware, Montgomery, Chester and Bucks.

PROTEST OF DEE DEE CAB, INC. D/B/A PENN-DEL CAB

TO THE APPLICATION OF

GRANNY'S HELPING HANDS PA, INC. T/A LET'S GO TRANSPORTATION, LLC

1. DEE DEE CAB, INC. D/B/A/ PENN-DEL CAB (Dee Dee) protests the Application of Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC. (Applicant).

2. Dee Dee is a certified public utility authorized to transport persons upon call or demand in the State of Pennsylvania with certain restrictions. A description of Dee Dee's certified area is contained in its tariff, which is attached hereto and marked Exhibit "A". Dee Dee's address is 702 Mac Dade Blvd. Collingdale, PA 19023.

3. Applicant is seeking to transport, by motor vehicle, persons, upon call or demand, in the Counties of Delaware, Montgomery, Chester and Bucks.

4. Protestant objects to the granting of this application on the ground that Applicant cannot meet its burden under 52 Pa. Code § 41.14 as to need, financial and technical fitness and harm to Protestant.

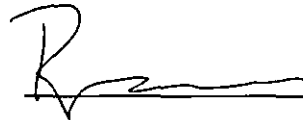
5. Protests to this Application are due on or before April 20, 2015. This is a timely protest and therefore Dee Dee is entitled to participate in this proceeding as a party intervener pursuant to 52 PA. Code 3.381.

6. Pursuant to 333(c) of the Pennsylvania Public Utility Code, demand is made upon Applicant to furnish Protestant with a list of the names and addresses of witnesses he intends to call and a brief summary of the proposed testimony; in particular, complaints, if any, against the services of the Protestant.

7. Additionally, demand is made upon Application to furnish Protestant with proof of need for service and financial and technical fitness.

8. Protestant will agree to withdraw its protest if the Applicant agrees not to operate in Protestant's authorized territory.

WHEREFORE, DEE DEE CAB, INC. D/B/A/ Penn-Del Cab, respectfully requests this Commission to deny the Application of Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC



RONALD WINKELVOSS,
PRESIDENT, DEE DEE
CAB, INC.

4-20-15

condition which establishes the service under the right to transfer.

QUAKER

The total purchase price for the call or demand business is \$48,125.00. The aforementioned purchase price represents the following:

Intrastate Authority	\$12,000.00
Goodwill	\$26,000.00
Vehicles	\$ 3,125.00
Equipment	\$ 7,000.00

The authority to be transferred has been operated by the transferor, therefore, it is presumed that there is a continuing need, which may be overcome only by evidence to the contrary. In re: Byerly, 440Pa. 521 (1970); Hostetter v. Pa. E.U.C., 160 Super. Ct. 94 (1947) Since the record is void of any such evidence, this presumption of continuing public need applies in this transfer proceeding.

After complete review of the record, We Find:

1. The applicant is fit, willing and able to provide the service proposed.
2. Transfer of the authority is in the public interest and is necessary for the continued accommodation and convenience of the public; THEREFORE,

IT IS ORDERED: That the transfer application be and is hereby approved and that a certificate be issued granting the following right:

*Dee Dee Cab
T/A
Penn-Del*

To transport, as a common carrier, persons, upon call or demand:

- (1) between points in the borough Lansdowne, Delaware County;
- (2) in that portion of the township of Upper Darby, Delaware County, west of and including Lansdowne Avenue;
- (3) at the 69th Street Terminal in the township of, Upper Darby, Delaware County; and
- (4) within that area of the City of Philadelphia bounded on the north by Lancaster Avenue, on the east by 56th Street, on the south by Grays Avenue (Grays Ferry Avenue), and on the west by the city limits;

Dee Dee Cab, Inc. t/a
Penn-Del Cab
A00116499
306 E. Baltimore Pike, Suite A
Media, PA 19063

VERIFICATION

RONALD WINKELVOSS verifies that he/she is acquainted with the facts and information set forth in the foregoing pleadings are true and correct to his/her knowledge, information and belief; and that the foregoing Verification is made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

DATE: 4-20-15



RONALD WINKELVOSS

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APPLICATION OF

A-2015-2469125

GRANNY'S HELPING HANDS PA, INC. T/A LET'S GO TRANSPORTATION, LLC

CERTIFICATE OF SERVICE

I, hereby certify that I mailed by first class mail, postage prepaid, a copy of the foregoing Protest of Dee Dee Cab, Inc., D/B/A Penn-Del Cab to the Application of Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC

Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC
P.O. Box 725
Lamdowne, PA 19050



RONALD WINKELVOSS, PRESIDENT
DEE DEE CAB, INC.

Dated: 4-20-15

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