COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION



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 RONALD CAB, INC. D/B/A COMMUNITY CAB TO THE APPLICATION OF

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

RONALD CAB, INC. D/B/A/ COMMUNITY CAB (Ronald) protests the 1. Application of Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC. (Applicant).

2. Ronald is a certified public utility authorized to transport persons upon call or demand in the State of Pennsylvania with certain restrictions. A description of Ronald's certified area is contained in its tariff, which is attached hereto and marked Exhibit "A". Ronald'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.

Protestant objects to the granting of this application on the ground that 4 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 Ronald 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, RONALD CAB, INC. D/B/A/ Community 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,

RONALD WINKELVOSS, PRESIDENT, RONALD CAB, INC.

4-20-15

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Read Roro UCABT/A Community

Since the record is void of any such evidence, this presumption of continuing public need applies in this transfer proceeding.

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 rights:

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

- (1) at the 69th Street terminal located in the township of Upper Darby, Delaware County;
- (2) at the SEPTA terminal at 9th and Main Streets, in the borough of Darby, Delaware County; and
- (3) in the boroughs of East Lansdowne and Yeadon, and that portion of Upper Darby Township south of and including Marshall Road and east of Union Avenue and Wycombe Avenue, north of the Eden Borough line and west of Cobbs Creek Parkway, Delaware County.

subject to the following general conditions:

- 1. That the operating authority granted herein, or now held, or subsequently granted to the applicant to the extent that it is duplicative, shall not be construed as conferring more than one operating right.
- 2. That the approval hereby given is not to be understood as committing the Commission, in any proceedings that may be brought before it for any purpose, to fix a valuation on the property and/or right(s) to be acquired by applicant from the present certificate holder equal to the consideration to be paid therefor, or equal to any value that may be placed thereon by applicant, or to approve or prescribe rates sufficient to yield a return thereon.
- 3. That the applicant record in its Utility Account 1321 Franchises, the actual cost of such right(s) recorded by the original holder thereof.

Ronald Cab, Inc. t/a Community Cab A00116500 306 E. Baltimore Pike, Suite A Media, PA 19063

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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.

RONALD WINKELVOSS

DATE: 4-20-5-

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE:

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 Ronald Cab, Inc., D/B/A Community 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 Lansdowne, PA 19050

RONALD WINKELVOSS, PRESIDENT RONALD CAB, INC.

Dated: 4-20-15



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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU