

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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2015 APR 20 AM 11:08
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 SHAWN CAB, INC. D/B/A DELAWARE COUNTY CAB COMPANY

TO THE APPLICATION OF

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

1. SHAWN CAB, INC. D/B/A/ DELAWARE COUNTY CAB COMPANY (Shawn) protests the Application of Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC. (Applicant).

2. Shawn is a certified public utility authorized to transport persons upon call or demand in the State of Pennsylvania with certain restrictions. A description of Shawn's certified area is contained in its tariff, which is attached hereto and marked Exhibit "A". Shawn'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 Shawn 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, SHAWN CAB, INC. D/B/A/ Delaware County Cab Company, 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, SHAWN
CAB, INC.

4-20-15

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 right:

To transport, as a common carrier, persons, upon call or demand, in the townships of Upper Providence, Springfield, Ridley, Nether Providence, Middletown, Edgemont, and Aston, and the boroughs of Chester Heights, Brook Haven, Media, Morton, Ridley Park, Rose Valley, Swarthmore, Rutledge and Glenolden, all in the county of Delaware.

*Shawn
TFA
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.
4. That the utility accounts of the transferee shall reflect the same book values for all utility property acquired as shown in the records of the transferor at the effective date of the transfer, any previously recorded depreciation having been deleted therefrom.
5. That the applicant charge to Account 1341 - Other Intangible Property, any amount of the consideration paid for the right(s) and going concern value attributable thereto in excess of the amounts

Shawn Cab, Inc. t/a
Delaware County Cab Company
A00116498
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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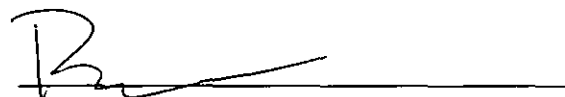
A-2015-2469125

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 Shawn Cab, Inc., D/B/A Delaware County Cab Company 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
SHAWN CAB, INC.

Dated: 4-20-15

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APR 20 2015

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