

LAW OFFICES OF
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TELEPHONE (610) 378-5272
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May 27, 2015

Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17120

Re: Protest of
Reading Metro Cab, Inc.
To Application of
Amigo Cab, LLC
A-2015-2475776


Dear Sir or Madam:

Please accept this letter as my entry of appearance on behalf of Reading Metro Cab, Inc. Enclosed for filing are two copies of the Protest of Reading Metro Cab, Inc. to the application of Amigo Cab, LLC, which I am filing on behalf of my client.

By way of copy of this letter and enclosure, a copy of this Protest is being served upon the Applicant.

Very truly yours,

LAW OFFICES OF STEPHEN G. WELZ, P.C.


Stephen G. Welz

SGW/alw
Enclosures
Cc: Amigo Cab, LLC
(w/enclosure)

RECEIVED
2015 MAY 29 AM 10:47
PA P.U.C.
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
2015 MAY 29 AM 10:47
PA P.U.C.
SECRETARY'S BUREAU

Re: A-2015-2475776
Amigo Cab, LLC (2304 Walnut Street, Harrisburg, PA 17103) for Approval to
Begin Operating as Common Carriers for Transportation in call or demand service,
in the Counties of Berks and Lancaster to points in Pennsylvania and return.

Pennsylvania Bulletin Reference: May 23, 2015
45 Pa.B. 2566

PROTEST OF
READING METRO TAXI CAB, INC.
A.101102

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

Reading Metro Cab, Inc.
615 Elm Street
Reading, PA 19601
Telephone: 610-373-8666

2. The name, address and telephone number of Protestant's attorney is:

Stephen G. Welz, Esquire
LAW OFFICES OF STEPHEN G. WELZ, P.C.
999 Berkshire Blvd., Suite 290
Wyomissing, PA 19610-1254
Telephone: 610-378-5272

3. Protestant possesses authority of A.101102, summary attached as Exhibit "A";

Under these rights, Protestant has been for many years providing full service,
which is identical to the service which Applicant seeks to provide to, from and between
points in the County of Berks.

The subject area is already served by six licensees plus unauthorized carriers, and
there is no need for additional service.


4. Without knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be prepared. In addition, Protestant requires additional information regarding applicant's fitness, financially and otherwise.
5. Protestant holds out to perform and does perform an adequate and satisfactory service, and diversion of its revenue would be extremely adverse to this Protestant, and would be adverse to call and demand service presently being rendered in Berks County.
6. Protestant knows of no amendment which will satisfy its interests in this proceeding.
7. Absent an appropriate amendment and pursuant to Section 333 (c) of the Public Utility Law, Protestant requests that Applicant furnish it and its counsel a list of the names and addresses of all witnesses Applicant intends to call.

Absent an appropriate amendment, Protestant prays the application may be dismissed.

AND IT WILL EVER PRAY.

DATED: May 27, 2015

Reading Metro Cab, Inc.

By: 
Curtis G. Stricker, President

RECEIVED
MAY 29 2015
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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SECRETARY'S BUREAU

Exhibit "A"

COPY

Certificate No. A.101102

Call and Demand PA PUC No. 7
Cancels
Call and Demand PA PUC No. 6

READING METRO TAXI CAB INC.

OPERATING AUTHORITY:

Folder 1

To transport, as a common carrier, by motor vehicle, persons upon call or demand in the City of Reading, Berks County, and within ten (10) miles of the Courthouse in said City;

Folder 2

To transport, as a common carrier, by motor vehicle, persons upon call or demand in the City of Reading, Berks County, and within a radius of ten (10) miles of the corporate limits of the said City, including the boroughs of Birdsboro, Kenhorst, Laureldale, Mohnton, Mt. Penn, Robesonia, Shillington, Sinking Springs, St. Lawrence, Temple, Wernersville, West Lawn, West Leesport, West Reading and Wyomissing, and the townships of Exeter, Spring and Bern, Berks County

ISSUED June 18, 2007

EFFECTIVE July 18, 2007

By: Curtis G. Stricker, President
615 Elm Street
Reading, Pennsylvania 19601
(610) 373-8666
(610) 374-5111

EXHIBIT A

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of AMIGO CAB, LLC :
(2304 Walnut Street, Harrisburg, PA) for :
Approval to Begin Operating as Common Carriers : A-2015-2475776
for Transportation in call or demand service, in the :
Counties of Berks and Lancaster :

CERTIFICATE OF SERVICE

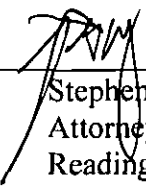
I HEREBY CERTIFY that I have this date served a true and correct copy of the foregoing Protest of Reading Metro Cab, Inc. to the Application of AMIGO CAB, LLC, in accordance with the requirements of Subsection 1.54, by regular U.S. Mail, as follows:

AMIGO CAB, LLC
2304 Walnut Street
Harrisburg, PA 17103

LAW OFFICES OF STEPHEN G. WELZ, P.C.

DATED: May 27, 2015

By: _____


Stephen G. Welz, Esquire
Attorney for
Reading Metro Cab, Inc.
Attorney ID 23280

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