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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JUN 30 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Application of Susquehanna Valley

Limousine, Inc. t/a Susquehanna Valley

Docket No. A-2015-2472707

Taxi Service

**MOTION TO ALLOW PROTEST FILED NUNC PRO TUNC,
AND ALSO ALLOW MODIFICATION OF ORIGINAL PROTEST
TO ALLOW FOR THE POSSIBILITY OF NEGOTIATING A
RESTRICTIVE AMENDMENT**

6/29/15

TO THE HONORABLE OFFICE OF ADMINISTRATIVE LAW JUDGE:

I will be responding to the Motions listed on the application to strike protest to the paragraphs and numbers listed on the motion to strike application as follows. Line no.9 states that I had said that financial hardships would occur if individuals were allowed to file for authority already held by other individuals because of the expense occurred by the authority holder to defend their area. That was not the point I was trying to make. The point I was trying to make was allowing individuals in the commonwealth of Pa. filing for authority to file such a broad application listing entire counties would on a regular basis cause many small carriers such as myself to constantly seek legal counsel to defend the authority that they may hold. What I'm asking is why individuals filing for authority are not required to be more specific in their request.

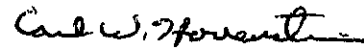
Line no.11 My response is I do understand that as a corporation I am required to retain counsel if this matter does go before a hearing, and I would retain counsel at that time. I am filing these protest and motions on my own in order to save the large amount of expense from retaining counsel at this time.

Line no. 15 States that my explanation of being too busy and missing the deadline is a legitimate reason, for the following reasons, I am a small business owner who is the driver the accountant, the mechanic, the dispatcher, the secretary and everything I need to be to keep this company running. Unfortunately with this work load I sometimes do miss things. I'm sure Mr. Doll finds himself in this situation from time to time and must ask the courts for an extension or continuance. I apologize for the late filing but in closing I'm asking your honor to please grant me to continue with my protest and also grant me the opportunity to file a modified protest in order for a

possibility of coming up with a restrictive amendment to avoid any additional legal fees that will be required if we go before a hearing. Thank you your honor in consideration of this matter.

Sincerely,

Carl W Hovenstine



Vice President/Secretary

Pauls Cab Service Inc.

PAULS CAB SERVICE INC.
735 MARKET ST.
SUNBURY PA. 17801
570-259-5661

PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265
HARRISBURG PA. 17105-3265

6/29/15

MODIFIED PROTEST

DEAR SIR,

I Carl W Hovenstine Vice President/Secretary representing Pauls Cab Service Inc. 735 Market st. Sunbury Pa. 17801. I am filing this modified protest Nunc Pro Tunc. The reason for this is I was extremely busy trying to take care of my business and failed to review the Pa. Bulletin until it was to late to file under the normal filing time line. Dear Sir I am asking if you would still please allow this protest as has occurred in other instances. I am protesting the application of Susquehanna Valley Limousine Inc. 2225 Ridge Rd. Northumberland Pa. 17857 Docket# A-2015-2472707 for permanent authority in areas that I currently service. Filing under Code 52 Chapter 3 3.381. We would be willing to accept restrictions to this application. We currently hold authority under the following tarrifs A-00119340 City of Sunbury Northumberland County. Borough of Northumberland Pa. Northumberland County, Borough of Shamokin Dam, Borough of Hummelswharf and Borough of Selinsgrove Pa. Snyder County, Upper Augusta Township Northumberland County, A-00119340f2 Borough of Lewisburg Pa. Union County, Borough of Milton Pa. Northumberland County and 5 air miles from the borders of these boroughs. A-2010-2152783 So as to permit the persons in paratransit service for the Pa. Department of Welfare of Northumberland County and Union County. Including careerlink clients in Union County, and patients of Evangelical Hospital, between points, and within a 10 air mile radius of the boroughs of Lewisburg, Milton, West Milton, Watsontown, Mifflinburg, Montandon, and Turbotville. To Allow Susquehanna Valley Limousine service to operate a taxi service in the areas listed above would severely impact our operations. This would reduce our income and cause layoffs and reductions of our staff. We Currently provide excellent service to all areas listed on our tariffs. Allowing the Susquehanna Valley Limousine Service to operate a taxi service in the areas listed above would be detrimental to everyone involved, causing two weaker business and put the risk of loss of service to everyone in our areas. In modifying this protest i am asking if we can possibly come up with a restritive amendment to benefit both parties and save a substantial amount of legal cost. I would like to thank you for your time in reviewing this matter.

Sincerely,



Carl W Hovenstine

Pauls Cab Service Inc.

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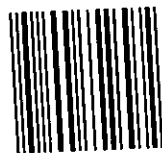
Pauls Cab Service Inc.
735 Market st.
Sunbury Pa. 17801



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