

LAW OFFICES

GREENSTEIN, GORELICK, PRICE, SILVERMAN & LAVESON

900 TWO PENN CENTER PLAZA

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DANIEL S. GREENSTEIN  
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ROBERT C. NATHAN  
ANDREW S. ROSS  
DEBORAH E. KOLODNER

ISAAC RICHMAN  
1938-1965

SIGMUND H. STEINBERG  
1924-1978

PAUL M. GOLDSTEIN  
1933-1963

November 8, 1984

FILE RECEIVED

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

NOV 13 1984

Attention: Jerry Rich, Secretary

SECRETARY'S OFFICE  
Public Utility Commission

Re: Application of King Limousine Service, Inc.  
PUC Docket No. A-105781

Dear Mr. Rich:

Kindly be advised that this office represents Anthony S. Viscusi, t/d/b/a Dav-El Livery Service; Best Limousine Company, t/d/b/a Dave's Limousine Service; and Limelight Limousine, Inc.

On behalf of our clients, we are enclosing herein Protests to the above Application together with a Petition to Intervene on behalf of the Delaware Valley Limousine Operators Association. Copies of same have been forwarded this date to the Applicant and its attorney.

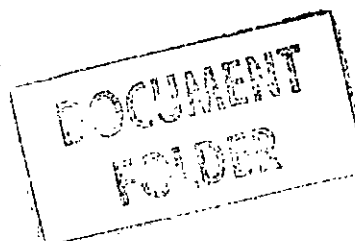
Kindly acknowledge receipt of the above by signing the enclosed copy of this letter and return same to the attention of the undersigned in the envelope provided.

Very truly yours,

*Alan R. Squires*  
ALAN R. SQUIRES

ARS:ss  
enclosures

cc: All parties of record



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SECRETARY'S OFFICE

Public Utility Commission

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF  
KING LIMOUSINE SERVICE, INC.

:  
:

APPLICATION DOCKET  
NO. A.105781

P R O T E S T

FILE

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Best Limousine Company, t/d/b/a Dave's Limousine Service ("Protestant" herein), by its attorneys, Alan R. Squires, Esquire, Greenstein, Gorelick, Price, Silverman & Laveson, and files its Protest to the instant Application and respectfully represents that:

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

Best Limousine Company, t/d/b/a  
Dave's Limousine Service  
8536 Ridgeway Street  
Philadelphia, PA 19111  
(215) 464-2745

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APPLICATION DOCKET
NOV 14 1984
ENTRY No. WIC

2. The name, address and telephone number of the  
Protestant's attorneys are:

Alan R. Squires, Esquire  
Greenstein, Gorelick, Price, Silverman & Laveson  
900 Two Penn Center Plaza  
Philadelphia, PA 19102  
(215) 564-3880

3. Protestant is certificated by your Honorable  
Commission at Application Docket No. A-00105095, Folder 1 and

DOCUMENT  
FOLDER


Folder 2. A copy of the relevant portions of the Protestant's authority upon which its Protest is herein predicated is attached hereto as Exhibit "A" and incorporated by reference herein.

4. Approval of the Application would create new and unwarranted competition to the detriment of Protestant and ultimately the public, tending to deprive Protestant of customers and to divert revenues from it which are essential to the maintenance of an adequate transportation system responsive to the needs of the public.

5. Approval of the Application would be contrary to the accommodation, convenience, service and safety of the public.

6. At the present time, there is no amendment to which Protestant is agreeable or would result in the withdrawal of the Protest.

Respectfully submitted,

  
ALAN R. SQUIRES, ESQUIRE  
GREENSTEIN, GORELICK, PRICE,  
SILVERMAN & LAVESON  
Attorneys for Protestant

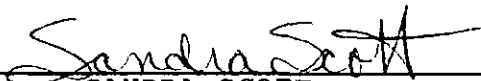
BEST LIMOUSINE COMPANY, t/d/b/a  
DAVE'S LIMOUSINE SERVICE  
APPLICATION DOCKET NO. A-105095, FOLDER 1

To transport, as a common carrier, persons upon call or demand in limousine service, without the use of meters, in the City of Philadelphia, Pennsylvania.

EXHIBIT "A"

CERTIFICATE OF SERVICE

I, Sandra Scott, hereby certify that on November 8, 1984, I forwarded by regular mail, postage prepaid, one copy of the Protest filed on behalf of Best Limousine Company, t/d/b/a Dave's Limousine Service to the Applicant, King Limousine Service, Inc. at 129 West DeKalb Pike, King of Prussia, Montgomery County, Pennsylvania 19406 and its attorney, Calvin S. Drayer, Jr., Esquire, One East Airy Street, P. O. Box 389, Norristown, Pennsylvania 19404.

  
SANDRA SCOTT

RECEIVED

NOV 13 1984

SECRETARY'S OFFICE  
BEFORE THE Public Utility Commission  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF : APPLICATION DOCKET  
KING LIMOUSINE SERVICE, INC. : NO. A.105781

P R O T E S T

**FILE**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Anthony S. Viscusi t/d/b/a Dav-El Livery Service, ("Protestant" herein), by its attorneys, Alan R. Squires, Esquire, Greenstein, Gorelick, Price, Silverman & Laveson, and files its Protest to the instant Application and respectfully represents that:

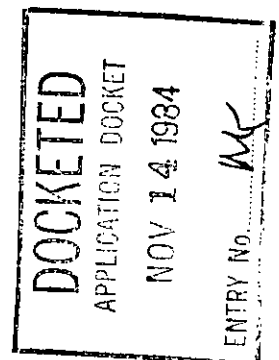
1. The name, address and telephone number of the Protestant are:

Anthony S. Viscusi t/d/b/a  
Dav-El Livery Service  
318 N. Lansdowne Avenue  
Lansdowne, PA 19050  
(215) 259-2900

2. The name, address and telephone number of the Protestant's attorneys are:

Alan R. Squires, Esquire  
Greenstein, Gorelick, Price, Silverman & Laveson  
900 Two Penn Center Plaza  
Philadelphia, PA 19102  
(215) 564-3880

3. Protestant is certificated by your Honorable Commission at Application Docket No. A-00099244, Folder 2. A



DOCUMENT  
FOLDER


copy of the relevant portions of the Protestant's authority upon which its Protest is herein predicated is attached hereto as Exhibit "A" and incorporated by reference herein.

4. Approval of the Application would create new and unwarranted competition to the detriment of Protestant and ultimately the public, tending to deprive Protestant of customers and to divert revenues from it which are essential to the maintenance of an adequate transportation system responsive to the needs of the public.

5. Approval of the Application would be contrary to the accommodation, convenience, service and safety of the public.

6. At the present time, there is no amendment to which Protestant is agreeable or would result in the withdrawal of the Protest.

Respectfully submitted,

  
ALAN R. SQUIRES, ESQUIRE  
GREENSTEIN, GORELICK, PRICE,  
SILVERMAN & LAVESON  
Attorneys for Protestant

DAV-EL LIVERY SERVICE  
APPLICATION DOCKET NO. A-00099244, FOLDER 2, Am-A

To transport persons, in limousine service, between points in the City and County of Philadelphia and from points in the said City and County to points within an airline distance of twenty-five (25) statute miles of City Hall in said City and County, and vice versa.


Subject to the following conditions:

That the service herein authorized is limited to transportation in vehicles having seating capacity of not more than ten (10) persons including the driver, without the use of dome lights and taximeter.



CERTIFICATE OF SERVICE

I, Sandra Scott, hereby certify that on November 8, 1984, I forwarded by regular mail, postage prepaid, one copy of the Protest filed on behalf of Anthony S. Viscusi, t/d/b/a Dav-El Livery Service to the Applicant, King Limousine Service, Inc. at 129 West DeKalb Pike, King of Prussia, Montgomery County, Pennsylvania 19406 and its attorney, Calvin S. Drayer, Jr., Esquire, One East Airy Street, P. O. Box 389, Norristown, Pennsylvania 19404.

  
SANDRA SCOTT

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NOV 14 1984

NOV 13 1984

Public Utility Comm.

SECRETARY'S OFFICE  
Public Utility Commission

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF  
KING LIMOUSINE SERVICE, INC.

:  
:

APPLICATION DOCKET  
NO. A.105781

P R O T E S T

FILE

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Limelight Limousine, Inc., ("Protestant" herein), by its attorneys, Alan R. Squires, Esquire, Greenstein, Gorelick, Price, Silverman & Laveson, and files its Protest to the instant Application and respectfully represents that:

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

Limelight Limousine, Inc.  
8302 Bustleton Avenue  
Philadelphia, PA 19152  
(215) 969-1818

2. The name, address and telephone number of the  
Protestant's attorneys are:

Alan R. Squires, Esquire  
Greenstein, Gorelick, Price, Silverman & Laveson  
900 Two Penn Center Plaza  
Philadelphia, PA 19102  
(215) 564-3880

3. Protestant is certified by your Honorable Commission  
at Application Docket No. A-105268. A copy of the relevant

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DOCKETED
APPLICATION DOCKET
NOV 14 1984
ENTRY No. <u>NK</u>


portions of the Protestant's authority upon which its Protests is herein predicated is attached hereto as Exhibit "A" and incorporated by reference herein.

4. Approval of the Application would create new and unwarranted competition to the detriment of Protestant and ultimately the public, tending to deprive Protestant of customers and to divert revenues from it which are essential to the maintenance of an adequate transportation system responsive to the needs of the public.

5. Approval of the Application would be contrary to the accommodation, convenience, service and safety of the public.

6. At the present time, there is no amendment to which Protestant is agreeable or would result in the withdrawal of the Protest.

Respectfully submitted,

  
ALAN R. SQUIRES, ESQUIRE  
GREENSTEIN, GORELICK, PRICE,  
SILVERMAN & LAVESON  
Attorneys for Protestant

LIMELIGHT LIMOUSINE, INC.  
APPLICATION DOCKET NO. A. 105268

To transport, as a common carrier, persons in luxury type limousines, having a seating capacity of no more than seven (7) persons, plus the driver, between points in the city and county of Philadelphia;

Subject to the following conditions:

1. That the above-described service be performed with uniformed multi-lingual chauffeurs.
2. That the service herein authorized shall be rendered in vehicles without the use of taximeters or dome lights.


To transport, as a common carrier, persons in limousine service, between points in the City and County of Philadelphia.

Subject to the following restrictions:

- A. The transportation is limited to the use of vehicles having a seating capacity not to exceed twelve (12) passengers, including the driver.
- B. The transportation is limited to the operation of not more than five (5) vehicles in said service.

CERTIFICATE OF SERVICE

I, Sandra Scott, hereby certify that on November 8, 1984, I forwarded by regular mail, postage prepaid, one copy of the Protest filed on behalf of Limelight Limousine, Inc. to the Applicant, King Limousine Service, Inc. at 129 West DeKalb Pike, King of Prussia, Montgomery County, Pennsylvania 19406 and its attorney, Calvin S. Drayer, Jr., Esquire, One East Airy Street, P. O. Box 389, Norristown, Pennsylvania 19404.

  
SANDRA SCOTT

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NOV 13 1984

SECRETARY'S OFFICE  
Public Utility Commission

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF  
KING LIMOUSINE SERVICE, INC.

:  
:

APPLICATION DOCKET  
NO. A.105781

PROTEST AND PETITION TO INTERVENE

**FILE**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Delaware Valley Limousine Operators Association, by its attorneys, Alan R. Squires, Esquire Greenstein, Gorelick, Price, Silverman & Laveson and files this Protest and Petition to Intervene to the above captioned Application, and, in support thereof, respectfully represents that:

1. The name and address of Petitioner are:

Delaware Valley Limousine Operators Association  
900 Two Penn Center Plaza  
Philadelphia, PA 19102

2. The name, address and telephone number of Petitioner's attorneys are:

Alan R. Squires, Esquire  
Greenstein, Gorelick, Price, Silverman & Laveson  
900 Two Penn Center Plaza  
Philadelphia, PA 19102

3. Petitioner is a non-profit corporation organized and existing under the Non-Profit Corporation Law of 1972, to promote

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APPLICATION DOCKET  
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ENTRY No. NIC

and advance the mutual interests of its members engaged in the transportation of persons by luxury limousine.

4. All members of Petitioner are certificated by the Public Utility Commission to provide luxury limousine service to the public in the area encompassed by the present Application.

5. Petitioner has standing to bring this Protest and Petition to Intervene since its interests are not represented on the record and your Petitioner will be bound by the action of Your Honorable Commission in this proceeding.

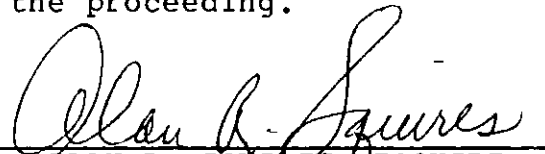
6. Applicant has not demonstrated that it is fit to render the proposed service to the public.

7. Approval of the Application would create new and unwarranted competition to the detriment of Petitioner's members and ultimately the public, tending to deprive such persons of customers and to divert revenues which are essential to the maintenance of an adequate luxury limousine service.

8. Approval of the Application is neither necessary nor proper for the service, accommodation, convenience or safety of the public.

WHEREFORE, Delaware Valley Limousine Operators Association, by its attorneys, files this Protest and Petition to Intervene to the Application of King Limousine Service, Inc. at

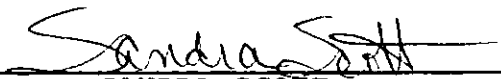
Application Docket No. A-00105781 and respectfully requests that the Application be dismissed, or in the alternative, Petitioner be permitted to intervene as a party in the proceeding.

  
ALAN R. SQUIRES, ESQUIRE  
GREENSTEIN, GORELICK, PRICE,  
SILVERMAN & LAVESON  
Attorneys for Petitioner



CERTIFICATE OF SERVICE

I, Sandra Scott, hereby certify that on November 8, 1984, I forwarded by regular mail, postage prepaid, one copy of the Protest and Petition to Intervene filed on behalf of the Delaware Valley Limousine Operators Association to the Applicant, King Limousine Service, Inc. at 129 West DeKalb Pike, King of Prussia, Montgomery County, Pennsylvania 19406 and its attorney, Calvin S. Drayer, Jr., Esquire, One East Airy Street, P. O. Box 389, Norristown, Pennsylvania 19404.

  
SANDRA SCOTT

*John T. Acton*  
A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

(215) 659-4600

JOHN T. ACTON  
EILEEN QUINN JUICO

RECEIVED  
SECRETARY'S OFFICE  
Public Utility Commission  
726 FITZWATERTOWN ROAD  
WILLOW GROVE, PA. 19090

November 15, 1984

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NOV 21 1984

TRANSPORTATION  
Public Utility Comm.

Mr. Jerry Rich, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17120

Re: Protest to Application for Rights by King Limousine Service, Inc.  
No. A-00105781

Dear Mr. Rich:

Enclosed herewith is Protest of Liberty Cab & Limousine Company to  
the application for rights of King Limousine Service, Inc.

Cordially,

*J. T. Acton*  
John T. Acton

JTA:sm  
Enclosure

cc: Calvin S. Drayer, Jr., Esquire  
One East Airy Street  
Norristown, PA 19404

King Limousine Service, Inc.  
129 West DeKalb Pike  
King of Prussia, PA 19406

Liberty Cab & Limousine Company

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SECRETARY'S OFFICE  
Public Utility Commission

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PROTEST TO APPLICATION OF

KING LIMOUSINE SERVICE, INC

NO. A-00105781

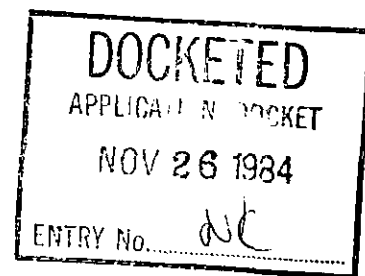
**FILE**

The following Corporation protests the above referenced application of

Liberty Cab & Limousine Company, Inc.  
Philadelphia International Airport  
Philadelphia, Pennsylvania 19153  
(215) 365-3403

Protestant's attorney is:

John T. Acton, Esquire  
726 Fitzwatertown Road  
Willow Grove, Pennsylvania 19090  
(215) 659-4600



The Docket Number of common carrier certificate of public convenience under which the Protestant operates is as follows:

Liberty Cab & Limousine Company, Inc.  
No. A-94986

The Protestant's interest is that it maintains a regularly scheduled service between certain points in the area projected to be serviced by the Applicant. The rights sought by the Applicant would have an adverse effect on Protestant's service by reason of the fact that it would permit Applicant to solicit business from points served by Protestant and thereby disrupt Protestant's scheduled service.

The relevant portions of Protestant's authority upon which their Protest is predicated is as follows:

**DOCUMENT  
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1. To transport, as a common carrier, persons in motor vehicles not exceeding seven (7) passengers in capacity, from points in the counties of Bucks and Montgomery within an airline distance of twenty-eight (28) statute miles of the limits of the Borough of Riegelsville, Bucks County, excluding points West of Pennsylvania Traffic Route 73, to Philadelphia International Airport, and vice versa:

2. To transport, as a common carrier, persons on special excursions, tours and sight-seeing trips and persons attending weddings, funerals and christenings, in limousine service in motor vehicles not exceeding seven (7) passengers in capacity, from points in the counties of Bucks and Montgomery within an airline distance of twenty-eight (28) statute miles of the limits of the Borough of Riegelsville, Bucks County, excluding points West of Pennsylvania Traffic Route 73, to points in Pennsylvania and return.

3. To transport, as a common carrier by motor vehicle, funeral accessories between points in the city and county of Philadelphia and within an airline distance of thirty (30) statute miles of City Hall in said city.

4. To transport, as a common carrier by motor vehicle, persons attending funerals and flowers for funerals between points in the city and county of Philadelphia and within an airline distance of thirty (30) statute miles of City Hall in said city.

5. To transport, as a common carrier by motor vehicle, persons attending weddings or christening parties to or from homes of weddings or christening parties and churches or places at which marriage ceremonies or christening services are performed in the city and county of Philadelphia.

6. To transport, as a common carrier, persons and their baggage, mail, express and newspapers, such as can be transported in vehicles without the removal of seats or inconvenience to passengers, from Philadelphia International Airport to points in the Township of Upper Merion, Montgomery County, and the Valley Forge General Hospital in the Township of Charlestown, Chester County, with no intermediate stops between King of Prussia and the Valley Forge General Hospital, and to the Village of Trevoise, Bucks County, located at the intersection of the Pennsylvania Turnpike and Highway Route 1, and vice versa.

7. To transport, as a common carrier by motor vehicle, persons on schedule from the Philadelphia International Airport in the city and county of Philadelphia to the George Washington Motor Lodge located on Highway Route 202 in the Village of King of Prussia, Upper Merion Township, Montgomery County, and vice versa.

8. To transport, as a common carrier by motor vehicle, persons on schedule from the Philadelphia International Airport in the city and county of Philadelphia to points on the following routes, and vice versa:

(a) Beginning at the George Washington Motor Lodge located on Highway Route 202 in the Village of King of Prussia, Upper Merion Township, Montgomery County, thence on Highway Route 202, Route 23, Highway Route 363 and Highway Route 422 to the Borough of Pottstown.

(b) Beginning at the George Washington Motor Lodge located on Highway Route 202 in the Village of King of Prussia, Upper Merion Township, Montgomery County, thence on Highway Route 202 and Interstate Highway Route 76 (Schuylkill Expressway) to Valley Forge Interchange of the Pennsylvania Turnpike, thence on the Pennsylvania Turnpike to Fort Washington Interchange, thence on Highway Route 309 to Sherator Penn-Pike Motor Inn and Fort Washington Industrial Park, thence returning on Highway Route 309 to Fort Washington Interchange, thence on Pennsylvania Turnpike to Willow Grove Interchange, thence on Highway Route 611 to the Village of Willow Grove.

9. To transport, as a common carrier by motor vehicle having a seating capacity of no more than eleven (11) passengers, persons on schedule from points on the following route and spur routes to the Philadelphia International Airport and vice versa:

(a) Beginning at the western boundary of the Borough of Norristown, on West Main Street, thence eastwardly on West Main Street to Arch Street, thence northwardly on Arch Street to Airy Street, thence east on Airy Street to Sandy Hill Road, and along same to Germantown Pike, thence on Germantown Pike to its intersection with Chemical Road, thence via Chemical Road to North Lane, thence via North Lane to Butler Pike, thence via Butler Pike and Fayette Street through the Borough of Conshohocken, thence via bridge over the Schuylkill River to the Borough of West Conshohocken, thence through the Borough of West Conshohocken to the Schuylkill Expressway, thence via the Schuylkill Expressway and Highway Route 291 to Philadelphia International Airport, and returning via the same route, substituting, however, Airy Street for Main Street between Arch Street and the west end of the Borough of Norristown.

(b) Spur Routes:

Beginning at the intersection of Walton Road and Germantown Pike, thence via Walton Road to its intersection with Township Line Road, thence via Township Line Road to its intersection with Jolly Road, thence via Jolly Road to its intersection with DeKalb Pike (Route 202), thence via DeKalb Pike to its intersection with Township Line Road.

Beginning at the intersection of Germantown Pike and Plymouth Road, thence southwestwardly on Plymouth Road for a distance of one-fourth (1/4) of a mile; with the above right to be subject to the following conditions:

(i) That no right, power or privilege be granted to pick up or discharge passengers between the southern boundary of the Borough of West Conshohocken and said airport, except at the airport.

(ii) That in rendition of the service herein authorized, all passengers must either be picked up or discharged at the Philadelphia International Airport.

(iii) That there be only one point of pickup and discharge in the Borough of West Conshohocken (the Tankard Inn), one point of pickup or discharge in the Borough of Conshohocken (U.S. Postoffice); and three points of pickup and discharge in the Borough of Norristown west of Riverview Hospital (two of which shall be the Valley Forge Hotel and the Colonial House Motel.)

10. To transport as a common carrier by motor vehicle having a seating capacity of no more than eleven (11) passengers, on schedule from Philadelphia International Airport, to points in the Townships of Montgomery, Lower Gwynedd, Upper Gwynedd and Towamencin, Montgomery County, and vice versa.

11. To transport as a common carrier, persons and their baggage on schedule in vehicles having a seating capacity of not more than eleven (11) passengers, on schedule from Philadelphia International Airport from points on a route beginning at the intersection of Washington Lane and Cheltenham Avenue, thence via Washington Lane to Township Line Road, thence via Township Line Road to Highway Route 611, thence via Highway Route 611 to its intersection with Cheltenham Avenue, thence with closed doors on Highway Route 611 to its intersection with Roosevelt Boulevard (Highway Route 1) to the Philadelphia International Airport, and vice versa, all transportation to originate or terminate at the Philadelphia International Airport or at points on the above route in Montgomery County.

12. To transport, as a common carrier, persons and their baggage, mail, express and newspapers, on schedule in vehicles having a seating capacity of not more than eleven (11) passengers from points and places in the Townships of West Norriton, Whitpain, Norriton, Worcester and Lower Providence in Montgomery County, the Townships of Schuylkill and Treddyffrin in Chester County to the Philadelphia International Airport, and vice versa, subject to the following conditions:

(a) that no right, power or privilege is granted to transport persons and their baggage to or from that portion of Treddyffrin Township, Chester County on and south of Conestoga Road, Upper Gulph Road and Groton Road.

13. To transport, as a common carrier, persons and their baggage, on schedule, in motor vehicles having a seating capacity of not more than eleven (11) passengers over the following spur routes:

(a) Beginning at the Oak Summit Apartments on Easton Road in Glenside, thence over Easton Road to Limekiln Pike, thence via Limekiln Pike to Greenwood Avenue, thence via Greenwood Avenue to West Avenue, thence via West Avenue to the Beaver Hill Apartments, thence over West Avenue to Township Line Road, thence via Township Line Road to its intersection with Washington Lane, and vice versa.

(b) Beginning at the Oak Summit Apartments on Easton Road in Glenside, thence over Easton Road to Church Road, thence via Church Road to its intersection with Washington Lane, and vice versa.

13. To transport, as a common carrier, persons and baggage in vehicles having a seating capacity of not more than eleven (11) passengers, on schedule, from points on the following route to the Philadelphia International Airport, and vice versa:

(a) Beginning at the intersection of Main Street and Mill Street in the Borough of Norristown, thence via Mill Street to Lafayette Street, thence via Lafayette Street to DeKalb Pike (Route 202), thence via DeKalb Pike to Goddard Boulevard in Upper Merion Township in Montgomery County, thence via Goddard Boulevard to the Schuylkill Expressway, thence via the Schuylkill Expressway, thence continuing via the Schuylkill Expressway and Highway Route 291 to the Philadelphia International Airport, and vice versa; subject to the following conditions:

(i) That no right, power or privilege is granted to pick up or discharge passengers between the southern boundard of the Borough of West Conshohocken and said airport, except at the airport.

(ii) That in the rendition of the service herein authorized, all passengers must either be picked up or discharged at the Philadelphia International Airport.

No amendment to the application would remove this Protest, since the areas sought in the application of King Limousine Service, Inc. for authority already receive completely adequate service and additional service would not be warranted by public need and demand.

Respectfully submitted

  
JOHN T. ACTON  
Attorney for Protestant

LAW OFFICES

SOMERSON AND BOMZE, P.C.

SUITE 1300-1401 ARCH STREET

PHILADELPHIA, PA. 19102

HERBERT SOMERSON

JAY I. BOMZE

VAL FLEET WILSON

CHARLES L. TANNENBAUM\*

JANET W. STARWOOD

\*ALSO FLA BAR

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Non-  
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November 19, 1984

Philadelphia Office  
Bureau of Safety & Compliance

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NOV 23 1984

SECRETARY'S OFFICE  
Public Utility Commission

Mr. Jerry Rich  
Secretary  
Pennsylvania Public Utility Commission  
North Office Building  
P.O. Box 3265  
Harrisburg, Pennsylvania 17120

RE: Application of King Limousine Service, Inc.  
A.00105781

Dear Mr. Rich:

Enclosed please find the original and three copies of the Protest of Harp Brothers, Inc. and Calvin D. Harp, t/d/b/a Harp Brothers to the above captioned application.

Sincerely,



VAL FLEET WILSON

VPW/bps

Enclosure:

cc: King Limousine Service, Inc.  
Calvin S. Drayer, Jr., Esquire  
Harp Brothers, Inc.  
Calvin D. Harp, t/d/b/a Harp Brothers

DOCUMENT  
FOLDER



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

IN RE: APPLICATION OF KING LIMOUSINE SERVICE, INC.  
DOCKET NUMBER: A.00105781

NOV 23 1984

SECRETARY'S OFFICE  
Public Utility Commission

PROTEST OF HARP BROTHERS, INC. AND CALVIN D. HARP  
t/d/b/a HARP BROTHERS TO APPLICATION OF  
KING LIMOUSINE SERVICE, INC. A.00105781

FILE

Harp Brothers, Inc. and Calvin D. Harp, t/d/b/a Harp Brothers, who are joint protestants, and who filed this Protest in the Philadelphia Office of the Pennsylvania Public Utility Commission on November 19, 1984 submit the following information:

1. The name of the applicant is King Limousine Service, Inc., 129 West DeKalb Pike, King of Prussia, Montgomery County, Pennsylvania 19046 Docket Number: A.00105781.

2. The name, business address and telephone number of the protestants are: 1. Harp Brothers, Inc., 18 South Hanover Street, Pottstown, Pennsylvania 19464, 215-823-8700; and 2. Calvin D. Harp, t/d/b/a Harp Brothers, same address and telephone number.

3. The name, business address and telephone number of Protestants attorney is Somerson and Bomze, P.C., 1401 Arch Street, Suite 1300, Philadelphia, Pennsylvania 19102, 215-569-3030 by Val Pleet Wilson, Esquire.

4. Protestants' interest in the proposed application is that they have rights to a substantial portion of the area requested by applicant as set forth in Protestants' schedule of rights which are attached hereto. Protestants aver that the approval of the application would have a serious financial impact on Protestants in that Applicant would be competing directly with Protestants.

DOCKETED

APPLICATION DOCKET

NOV 26 1984

ENTRY NO. 100

DOCUMENT  
FOLDER

5. The Commission Docket Numbers under which Protestants operate and a copy of their rights in pertinent part are attached hereto.

6. Protestants would withdraw their protests if Applicant would delete those portions of the territory in which Protestants currently have the rights to operate.

7. Protestants reserve the right to argue and contend that Applicant does not satisfy the burdens and standards of 52 Pa. Code §41.14 namely, that:

A. Approval of the application will not serve a useful public purpose responsive to a public need or demand.

B. Applicant does not possess the technical or financial ability to provide the proposed service and or lacks a propensity to operate safely and legally.

C. Entry of a new carrier would endanger or impair the operations of an existing carrier or carriers to such an extent that, on balance, the granting of the authority would be contrary to the public interest.

8. I certify that a copy of this Protest has been forwarded to Applicant King Limousine Service, Inc., 129 West DeKalb Pike, King of Prussia, Montgomery County, Pennsylvania 19046 and applicant's attorney Calvin S. Drayer, Jr., Esquire, One East Airy Street, P.O. Box 389, Norristown, Pennsylvania 19404.

Respectfully submitted,

  
VAL PLEET WILSON

APPENDIX

RIGHTS OF HARP BROTHERS, INC.    A.99550

To transport as a common carrier, persons in paratransit service between points in the borough of Pottstown, Montgomery County and within an airline distance of fifteen statute miles of the limits of said borough subject to the following conditions:

(1) Service herein authorized is limited to transportation in vehicles having a seating capacity of not more than fifteen (15) passengers including the driver without the use of taxi meters or dome lights; (2) The service herein authorized is limited to transportation for which advance reservations are made in a vehicle not reserved for individual use with the minimum time requirement for an advance reservation stated in the tariff; (3) The service herein authorized is subject to all rules and regulations which the Commission may subsequently adopt; (4) No rights, powers or privilege is granted to render scheduled or fixed route service as defined in 52 Pa. Code §29.14; (5) No rights, powers or privilege is granted to render group and parts service as defined in 52 Pa. Code §29.16; (6) Applicant shall post in all vehicles which the Applicant operates under the authorities held at the number A.99550 and Folder 2 thereto, notice of the availability of the service herein authorized and the tariff for said service.

A.99550, Folder 2, AM-A

To transport as a common carrier by motor vehicle persons upon call or demand in the borough of Phoenixville, Chester County, Pennsylvania.

To transport as a common carrier by motor vehicle persons upon call or demand in the townships of Schuylkill, Charlestown and East Riceland, Chester County and the township of Upper Providence, Montgomery County.

To transport as a common carrier by motor vehicle persons upon call or demand in the borough of Royersford, Montgomery County and the borough of Spring City, Chester County.

Folder 5

To transport as a common carrier persons in airport transfer service from points in the borough of Pottstown, Montgomery County and within an airline distance of ten statute miles of the limits of said borough to the Philadelphia International Airport located in the City and County of Philadelphia and the townships of Tinicum, Delaware County and vice versa.

Folder 4

To transport as a common carrier by motor vehicle persons upon call or demand in the township of West Pottsgrove, Lower Pottsgrove, Upper Pottsgrove, Limerick, Douglass, New Hanover, Upper Frederick, Perkiomen and Skippack, Montgomery County; the townships of North Coventry, East Coventry, South Coventry, East Vincent, West Vincent, East Nantmeal, West Nantmeal and Warwick, Chester County; the townships of Douglas, Amity, Union, Colebrookdale, Washington, Hereford, Earl, Pike and District and the boroughs of Boyerstown and Bally in Berks County.

**WILSON, OEHRLER, DRAYER & FURBER**

ATTORNEYS AT LAW  
ONE EAST AIRY STREET  
P. O. Box 389

NORRISTOWN, PENNSYLVANIA 19404  
TELEPHONE (215) 277-3200

PARKER H. WILSON  
ALBERT C. OEHRLER  
CALVIN S. DRAYER, JR.  
WILLIAM J. FURBER, JR.  
LOIS SHERMAN HAGARTY  
JOHN H. MARTIN, III  
HEATHER RICHMOND KRONCKE

GLADWYNE OFFICE:  
1018 BLACK ROCK ROAD

November 21, 1984

Mr. David Ehrhart  
Supervisor, Applications Section  
Bureau of Non-Rail Transportation  
Public Utilities Commission  
P.O. Box 3265  
Harrisburg, Pennsylvania 17120

**FILE**

RE: Application of King Limousine Service, Inc.  
No. A-00105781

Dear Dave:

Enclosed you will find the completed and notarized forms of Proof of Publication of Hearing or No Hearing in the matter of King Limousine Service, Inc.

Sincerely,



Heather Richmond Kroncke

HRK:plt  
Encls.

RECEIVED

NOV 23 1984

Encl. Application  
Public Utility Comm.

DOCUMENT  
FOLDER

FORM OF PROOF OF PUBLICATION OF  
HEARING OR NO HEARING

Before  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the matter of the application of )  
(name of applicant) for a certificate ) Application Docket  
of public convenience evidencing ) A-00105781  
the Commission's approval of ) No....., 19.84  
(nature of application). ) Folder No.

Commonwealth of..Pennsylvania.. )  
..... )  
County of.....Berks..... )

ss:

**FILE**

On this.....13th.....day of .....November....., A. D. 19.....84  
before me, the subscriber, a Notary Public in and for said county and state,  
personally appeared.....Irma Drackly.....

(Name of affiant)

who, being duly sworn according to law, deposes and says, that<sup>s</sup> he is the

.....Assistant Secretary.....of the .....Reading Eagle - Times  
(publisher, editor, manager) (name of publication)

.....Reading.....in the  
(City or town)

county of.....Berks....., and state of.....Pennsylvania.....;  
and that the annexed is a true copy of a notice in the above matter published  
in said publication in the regular issues of.....November 13,.....

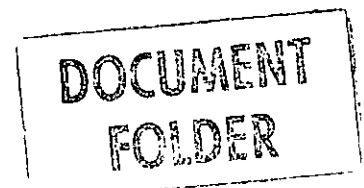
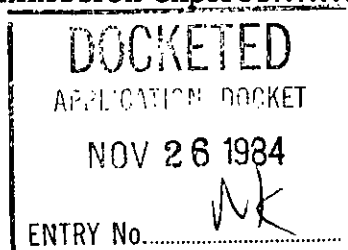
19.....84....., and.....19.....  
(month and day) (month and day)

.....*Irma Drackly*.....  
(Signature of affiant)

Sworn and subscribed before me the day and year aforesaid.

.....*Dawn G. Baumann*.....  
Notary Public

My commission expires.....March 21....., 19..85.....



UCMT-16

FORM OF PROOF OF PUBLICATION OF  
HEARING OR NO HEARING

Before  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

FORM OF NEWSPAPER  
PUBLICATION ON NO  
HEARING APPLICATION  
Notice is hereby given that ap-  
plication has been made to the  
Public Utility Commission of  
the Commonwealth of Pennsyl-  
vania, under the provisions of  
the Public Utility Law by King  
Limousine Service, Inc., 129 W.  
DeKelo Pike, King of Prussia,  
PA 19406 for a certificate of  
Public Convenience evidencing  
the Commission's requisite ap-  
proval of Deluxe Limousine  
Service in King of Prussia and  
within a radius of fifty (50)  
Miles.  
This application will be submit-  
ted to the Commission without  
a hearing provided no protests  
are filed prior to November 26,  
1984.  
Heather Richmond Kroncke  
Attorney for Applicant

In the matter of the application of )  
(name of applicant) for a certificate )  
of public convenience evidencing )  
the Commission's approval of )  
(nature of application). )

Application Docket

No. A-00105781, 19.84

Folder No.

Commonwealth of Pennsylvania )

ss:

FILE

County of Northampton )

On this 13th day of November, A. D. 1984  
before me, the subscriber, a Notary Public in and for said county and state,  
personally appeared Henry P. Hunter

(Name of affiant)

who, being duly sworn according to law, deposes and says, that he is the

Classified Advertising Manager of the The Express  
(publisher, editor, manager) (name of publication)

Easton in the  
(City or town)

county of Northampton, and state of Pennsylvania;  
and that the annexed is a true copy of a notice in the above matter published  
in said publication in the regular issues of November 13,

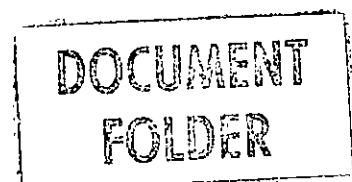
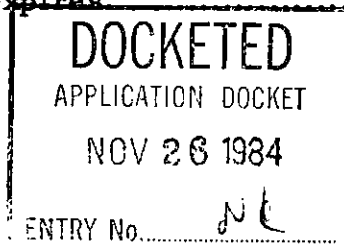
1984 (month and day)  
19, and 19 (month and day)

Henry P. Hunter  
(Signature of affiant)

Sworn and subscribed before me the day and year aforesaid.

H. C. Stackhouse  
Notary Public

My commission expires March 6, 1987



339641

UCMT-16

FORM OF PROOF OF PUBLICATION OF  
HEARING OR NO HEARING

Notice is hereby given that application has been made to the Public Utility Commission of the Commonwealth of Pennsylvania, under the provisions of the Public Utility Law by King Limousine Service, Inc., 129 W. DeKalb Pike, King of Prussia, PA 19406 for a certificate of Public Convenience evidencing the Commission's requisite approval of Deluxe Limousine Service in King of Prussia and within a radius of fifty (50) miles. This application will be submitted to the Commission without a hearing provided no protests are filed prior to November 26, 1984. Heather Richmond Kroncke Attorney for Applicant

Before  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the matter of the application of )  
(name of applicant) for a certificate ) Application Docket  
of public convenience evidencing ) No. A-00105781, 19.84.  
the Commission's approval of ) Folder No.  
(nature of application). )

Commonwealth of Pennsylvania )  
..... )  
County of Lancaster )

ss:

FILE

On this .....13th.....day of ..November....., A. D. 19..84....  
before me, the subscriber, a Notary Public in and for said county and state,  
personally appeared....Dolly J. Benner.....

(Name of affiant)

who, being duly sworn according to law, deposes and says, that he is the

.....Billing Clerk.....of the .....The New Era  
(publisher, editor, manager) (name of publication)

.....Lancaster.....in the  
.....(City or town)  
county of Lancaster.....and state of Pennsylvania

and that the annexed is a true copy of a notice in the above matter published  
in said publication in the regular issues of.....11/13.....  
(month and day)

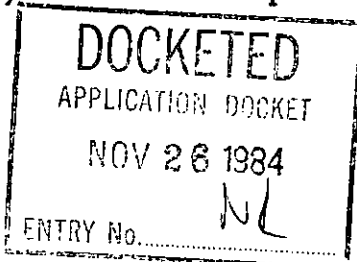
19.84....., and.....19.....  
(month and day)

.....Dolly J. Benner.....  
(Signature of affiant)

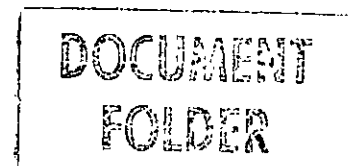
Sworn and subscribed before me the day and year aforesaid.

.....Mary J. McGuire.....  
Notary Public

My commission expires....., 19.....



Mary J. McGuire, Notary Public  
Lancaster, Lancaster County  
My Commission Expires Aug. 19, 1985





**WILSON, OEHRLE, DRAYER & FURBER**

ATTORNEYS AT LAW  
ONE EAST AIRY STREET  
P. O. Box 389

NORRISTOWN, PENNSYLVANIA 19404

TELEPHONE (215) 277-3200

PARKER H. WILSON  
ALBERT C. OEHRLE  
CALVIN S. DRAYER, JR.  
WILLIAM J. FURBER, JR.  
LOIS SHERMAN HAGARTY  
JOHN H. MARTIN, III  
HEATHER RICHMOND KRONCKE

GLADWYNE OFFICE:  
1016 BLACK ROCK ROAD

**FILE**

November 26, 1984

**RECEIVED**

NOV 28 1984

**SECRETARY'S OFFICE  
Public Utility Commission**

Pennsylvania Public  
Utilities Commission  
P.O. Box 3265  
Harrisburg, Pennsylvania 17120

Attn: Jerry Rich, Secretary

Re: Application of King Limousine  
Service, Inc. - P.U.C. Docket No. A-105781

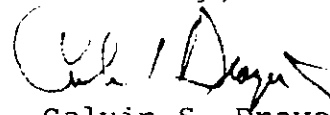
Dear Mr. Rich:

Enclosed is Applicant King Limousine Service, Inc.'s Answer to Protest and Petition to Intervene for filing with your office.

Copies of this Answer to Protest and Petition to Intervene have been mailed this date to Petitioner Delaware Valley Limousine Operators Association and its attorney, Alan R. Squires, Esquire.

I have enclosed a copy of this letter which I request you sign and return to me in the enclosed envelope in order to acknowledge your receipt of the above.

Sincerely,



Calvin S. Drayer, Jr.

CSD, Jr.:plt  
Encls.

*Handwritten note:* Noted 11/28/84

NOV 28 1984

Noted 11/28/84  
File 105781

**DOCUMENT  
FOLDER**

RECEIVED

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION NOV 28 1984

IN RE: APPLICATION OF  
KING LIMOUSINE SERVICE, INC.

: APPLICATION DOCKET  
: NO. A.105781

SECRETARY'S OFFICE  
Public Utility Commission

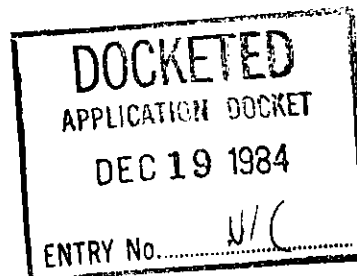
ANSWER TO PROTEST AND PETITION TO INTERVENE

FILE

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

King Limousine Service, Inc. by its attorney, Calvin S. Drayer, Jr., Esquire files this Answer to Protest and Petition to Intervene and in support thereof represents:

1. Admit.
2. Admit.
3. Denied. After reasonable investigation, applicant is without knowledge or information sufficient to form a belief as to the truth of this averment and strict proof is demanded at trial.
4. Denied. After reasonable investigation, applicant is without knowledge or information sufficient to form a belief as to the truth of this averment and strict proof is demanded at trial.
5. Denied. After reasonable investigation, applicant is without knowledge or information sufficient to form a belief as to the truth of this averment and strict proof is demanded at trial.
6. Denied as a conclusion of law to which no response is necessary.
7. Denied as a conclusion of law to which no response is necessary.



RECEIVED

NOV 28 1984

Received by [illegible]

NORRISTOWN, PA 19404

ONE EAST AIRY STREET

P.O. BOX 389

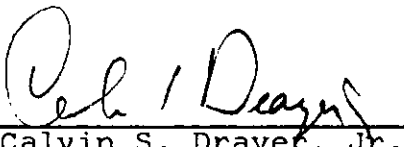
ATTORNEYS AT LAW

WILSON, OEHRL, DRAYER & FURBER

8. Denied as a conclusion of law to which no response is necessary.

WHEREFORE, Applicant King Limousine Service, Inc. respectfully request that Petitioner's Protest and Petition to Intervene as a party participant be denied.

WILSON, OEHRLE, DRAYER & FURBER

BY:   
Calvin S. Drayer, Jr.

**WILSON, OEHRLE, DRAYER & FURBER**

ATTORNEYS AT LAW  
ONE EAST AIRY STREET  
P. O. Box 389

NORRISTOWN, PENNSYLVANIA 19404  
TELEPHONE (215) 277-3200

PARKER H. WILSON  
ALBERT C. OEHRLE  
CALVIN S. DRAYER, JR.  
WILLIAM J. FURBER, JR.  
LOIS SHERMAN HAGARTY  
JOHN H. MARTIN, III  
HEATHER RICHMOND KRONCKE

GLADWYNE OFFICE:  
1016 BLACK ROCK ROAD

December 20, 1984

**FILE**

Mr. David Ehrhart, Supervisor  
Application Section  
Bureau of Non-Rail Transportation  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
P.O. Box 3285  
Harrisburg, Pennsylvania 17120

Re: Application of King Limousine Service, Inc.  
A-00105781

Dear Dave:

Enclosed please find Proofs of Advertising for the Application of King Limousine Service, Inc. from the Philadelphia Inquirer and Morning Call which we spoke about by phone.

Sincerely,



Heather Richmond Kroncke

HRK:plt  
Encls.

COPIES FILED

DEC 27 1984

Non-Rail  
Public Utility Comm.

DOUGLAS  
KRONCKE

**RECEIVED**

**DEC 27 1984**

Office of the A.L.J.  
Public Utility Commission

RECEIVED

FORM OF PROOF OF PUBLICATION OF  
HEARING OR NO HEARING

1984

Non-Public

File

PENNSYLVANIA PUBLIC UTILITY COMMISSION

FILE

In the matter of the application of )  
(name of applicant) for a certificate )  
of public convenience evidencing )  
the Commission's approval of )  
(nature of application). )

Application Docket

No. A-00105781, 19.84.

Folder No.

Commonwealth of..Pennsylvania.... )

ss:

County of...Philadelphia )

NOTICE IS HEREBY GIVEN that application has been made to the Public Utility Commission of the Commonwealth of Pennsylvania, under the provisions of the Public Utility Law by King Limousine Service, Inc., 129 W. DeKalb Pike, King of Prussia, PA 19006, Docket No. A-00105781, for a certificate of Public Convenience evidencing the Commission's requisite approval of Deluxe Limousine Service in King of Prussia and within a radius of fifty (50) miles. This application will be submitted to the Commission without a hearing provided no protests are filed prior to November 26, 1984. Heather Richmond Kroncke, Attorney for Applicant

On this .....3RD.....day of .DECEMBER....., A before me, the subscriber, a Notary Public in and for said cou personally appeared...KEVIN STUSKI.....

(Name of affiant)

who, being duly sworn according to law, deposes and says, that he is the

.....CLERK.....of the .....The Philadelphia Inquirer.....  
(publisher, editor, manager) (name of publication)

.....Philadelphia.....in the  
(City or town)

county of.....Philadelphia....., and state of.....Pennsylvania.....

and that the annexed is a true copy of a notice in the above matter published in said publication in the regular issues of....DECEMBER 3, 1984.....

(month and day)

19....., and.....19.....

(month and day)

Kevin Stuski  
(Signature of affiant)

Sworn and subscribed before me the day and year aforesaid.

PHYLLIS E. FEAGANS  
Notary Public, Phila., Phila. Co.

Notary Public

My commission expires...My Commission Expires Sept. 8, 1986....., 19.....

DOCUMENT  
FOLDERDOCKETED  
APPLICATION DOCKET

DEC 26 1984

ENTRY No. NK

FORM OF PROOF OF PUBLICATION OF  
HEARING OR NO HEARING

984

Non-  
Public Utility Comm.

Before  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the matter of the application of )  
(name of applicant) for a certificate )  
of public convenience evidencing )  
the Commission's approval of )  
(nature of application). )

Application Docket  
No. A-00105781, 19.84  
Folder No.

Commonwealth of Pennsylvania )  
County of Lehigh )

ss:



UCMT-18  
NO HEARING APPLICATION  
Notice is hereby given that  
application has been made to the  
Public Utility Commission of the  
Commonwealth of Pennsylvania,  
under the provisions of the  
Public Utility Law by King Lim-  
ousine Service, Inc., 129 W.  
DeKalb Pike, King of Prussia,  
PA 19406 for a certificate of  
Public Convenience evidencing  
the Commission's requisite ap-  
proval of Deluxe Limousine Ser-  
vice in King of Prussia and  
within a radius of fifty (50) miles.  
This application will be sub-  
mitted to the Commission with-  
out a hearing provided no  
protests are filed prior to No-  
vember 26, 1984.  
Heather Richmond Kroneke  
Attorney for Applicant  
C19371 - Nov. 14

On this 14th day of November, A. D. 1984  
before me, the subscriber, a Notary Public in and for said county and state,  
personally appeared Frederick R. Dieter

(Name of affiant)

who, being duly sworn according to law, deposes and says, that he is the

Treasurer of the The Morning Call  
(publisher, editor, manager) (name of publication)

Allentown in the  
(City or town)

county of Lehigh, and state of Pennsylvania;  
and that the annexed is a true copy of a notice in the above matter published  
in said publication in the regular issues of November 14  
(month and day)

1984, and 19  
(month and day)

(Signature of affiant)

Sworn and subscribed before me the day and year aforesaid.

Notary Public

My commission expires May 11, 1985, 19

MARIE BUSOLITS, NOTARY PUBLIC  
ALLENTOWN, LEHIGH COUNTY  
Member Pennsylvania Association of Notaries  
**DOCUMENT  
FOLDER**

**DOCKETED**  
APPLICATION DOCKET  
DEC 26 1984  
ENTRY No. NC



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P. O. BOX 3265, HARRISBURG, Pa. 17120

January 14, 1985

IN REPLY PLEASE  
REFER TO OUR FILE

A. 105781

MONITOR: COMMISSIONER SHANE

(See attached list)

Application of King Limousine Service, Inc.

Right to begin to transport, persons in limousine service, between points in the village of King of Prussia, Upper Marion Township, Montgomery County, and within an airline distance of fifty (50) statute miles of the limits thereof.

N O T I C E

This is to inform you that an initial hearing on the above-captioned case on Wednesday, February 13, 1985, at 10:00 a.m., in Room 1306, Philadelphia State Office Building, Broad and Spring Garden Streets, Philadelphia.

The presiding officer in this proceeding will be Administrative Law Judge Sheldon W. Farber. Judge Farber can be contacted at 1302 Philadelphia State Office Building, Broad and Spring Garden Streets, Philadelphia, Pennsylvania 19130; telephone (215) 351-2105.

If you intend to file exhibits, please be advised that two copies of all hearing exhibits to be presented into evidence must be submitted to the Reporter and an additional copy should be furnished to the presiding officer and each party of record.

cc: Judge Farber  
Bureau of Non-Rail Trans.  
Ms. Crouse  
Ms. Dickson  
Mr. Bramson  
File Room

**DOCUMENT  
FOLDER**

**DOCKETED**

**JAN 17 1985**

## WOLF, BLOCK, SCHORR and SOLIS-COHEN

TWELFTH FLOOR PACKARD BUILDING  
S.E. CORNER 15TH AND CHESTNUT STREETS  
PHILADELPHIA, PA 19102

(215) 977-2000  
TELECOPIER: 977-2334  
TWX: 710-670-1927  
WOLBLORR PHA

FLORIDA OFFICE  
SUITE 1009  
1655 PALM BEACH LAKES BOULEVARD  
P.O. BOX 027515  
WEST PALM BEACH, FL 33402  
(305) 471-3400  
TELECOPIER: (305) 684-4503

January 16, 1985

ROBERT B. WOLF  
MITCHELL E. PANZER  
RAYMOND J. BRADLEY  
FRANKLIN H. SPITZER  
ROBERT E. WACHS  
ANTHONY S. MINISI  
ALBERT J. FELDMAN  
ALLAN H. REUBEN  
HOWARD GITTIS  
SEYMOUR KURLAND  
GEORGE M. BRANTZ  
ROBERT M. SEGAL  
RAGAN A. HENRY  
LEONARD J. COOPER  
STEVEN A. ARBITTIER  
HENRY F. MILLER  
JAY L. GOLDBERG  
HENRY A. GLADSTONE  
H. ROBERT FIEBACH  
GERALD J. MCCONOMY  
BERNARD CHANIN  
DANIEL PROMISLO  
LEONARD J. BUCKI  
WILLIAM A. ROSOFF  
IVAN I. LIGHT  
JAMES A. ROSENSTEIN  
JOHN S. ROBERTS, JR.  
JUDITH R. COHN  
MARC M. SILBERT  
ROBERT MCL. BOOTE  
DAVID M. DORET  
IAN A. L. STROGATZ  
RICHARD H. GLANTON  
ARTHUR G. WROBLE\*  
HERMAN C. FALA  
STEVEN B. KING  
WILLIAM J. GREEN  
HENRY L. SHRAGER  
MICHAEL A. BUDIN  
ROBERTA D. LIEBENBERG  
BRUCE S. KATCHER

DONALD BEAN  
BERNARD M. BORISH  
FRANKLIN POUL  
DANIEL C. COHEN  
STANTON S. OSWALD  
ALVIN H. DORSKY  
DAVID J. KAUFMAN  
CARL W. SCHNEIDER  
MICHAEL M. DEAN  
MICHAEL L. TEMIN  
CHARLES G. KOPP  
ALAN J. DAVIS  
GERALD GORNISH  
ALAN H. MOLOD  
EDWARD M. GLICKMAN  
LOWELL M. DUBROW  
E. GERALD RIESENBAUGH  
JOSEPH M. MANKO  
RONALD M. WIENER  
WILLIAM J. MOREHOUSE  
STEPHEN M. GOODMAN  
HAROLD JACOBS  
ROBERT C. PODWIL  
WILLIAM P. THORN  
PAUL E. SHAPIRO  
DONALD K. JOSEPH  
MICHAEL M. SHERMAN  
JAY R. BAER  
JAMES S. BURNS  
ALAN S. KAPLINSKY  
DENNIS L. COHEN  
GREGORY T. MAGARITY  
DAVID R. GLYN  
MARC E. GOLD  
PHILIP E. GARBER  
BARRY F. SCHWARTZ  
ROBERT M. MCNAIR, JR.\*\*  
MARK A. ARONCHICK  
HOWARD BREGMAN  
MATTHEW H. KAMENS  
DAVID N. HOFSTEIN

## COUNSEL:

ALFRED L. WOLF  
HELEN SPIGEL SAX  
NATHAN SILBERSTEIN

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HELEN A. MARINO

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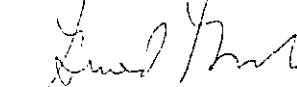
Public Utility Commission

Re: Application of King Limousine Service, Inc.  
A-105781

Dear Mr. Rich:

Please note my appearance on behalf of the above  
applicant in the above-captioned matter in place of Calvin  
F. Drayer, Jr., Esquire.

Very truly yours,



Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG:mc

cc: Hon. Sheldon W. Farber  
Calvin F. Drayer, Jr., Esquire  
Ms. Frances Walkenshaw

DOCUMENT  
FOLDER

DOCKETED  
JAN 22 1985



# APPEARANCE SHEET

## HEARING REPORT

DOCKET NO. A. 105781

CASE NAME King Limousine Service, Inc.

HEARING LOCATION Philadelphia, PA.

HEARING DATE February 13, 1985

ALJ Farber

CHECK THOSE BLOCKS WHICH APPLY:

Hearing concluded Not commenced (Acc

Record closed

Briefs to be filed

Further hearing

Estimated add'l days

BENCH DECISION

REMARKS: Continued, pending receipt of all withdrawals of protests prior to hearing (Modified Procedure expected).

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Public Utility Commission

~~Names and addresses of parties or counsel of record~~

Please Print Clearly

Incomplete Information May Result in Delay of Process

DOCUMENT

FOI b7D

NAME	ADDRESS			APPEARING FOR
	City	State	Zip	
	City	State	Zip	
	City	State	Zip	
	City	State	Zip	

Check this box if additional parties  
of counsel of record appear on back.

Reporter

**ORIGINAL**

LAW OFFICES

**WOLF, BLOCK, SCHORR AND SOLIS-COHEN**

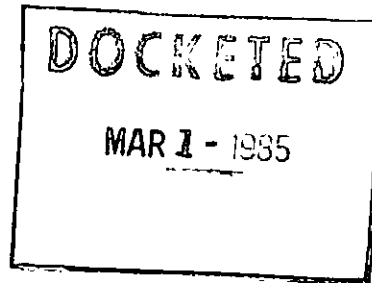
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ASSOCIATED WITH KOZLOV, SEATON & ROMANINI, P.C.  
(A FIRM OF NEW JERSEY ATTORNEYS)

February 27, 1985



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COUNSEL:

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DIRECT DIAL NUMBER:

(215) 977- 2118

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

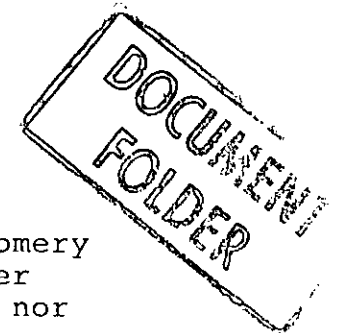
Re: King Limousine Service, Inc.  
A-00105781

Dear Mr. Rich:

On behalf of my client, King Limousine Service, Inc.,  
I wish to submit the following restrictive amendments based  
upon which all protestants have agreed to withdraw:

To transport persons in limousine service,  
between points in the Village of King of  
Prussia, Upper Merion Township, Montgomery  
County, and within an airline distance of  
fifty (50) statute miles of the limits  
thereof; provided:

1. The applicant will not pick up any  
passengers at the following Chester, Montgomery  
and Bucks County areas for eventual transfer  
to the Philadelphia International Airport, nor  
deliver any passenger to the following areas  
whose passage originated at the Philadelphia



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**SECRETARY'S OFFICE**  
**Public Utility Commission**

W. B. S. & S-C.

Jerry Rich, Secretary  
February 27, 1985  
Page Two

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International Airport; said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all of Chester County, and the Boroughs of Pottstown, Collegeville and Norristown, and the Townships of Upper Dublin, Whitemarsh, Montgomery, Upper Merion, Plymouth, Upper Moreland and Lower Gwynedd, Montgomery County, and the Townships of Bensalem, Doylestown, Warminster and Kulpsville in Bucks County; and

2. The applicant will not originate any transportation within the City and County of Philadelphia and will not pick up any passengers for eventual transfer to the Philadelphia International Airport from points within an airline distance of twenty (20) statute miles of City Hall in the City and County of Philadelphia, nor deliver any passenger whose passage originated at the Philadelphia International Airport to any point within an airline distance of twenty (20) statute miles of City Hall in said City and County.

Based on the above and the withdrawals of all protestants, I would request that this matter be handled through modified procedure. I would also request, in view of the luxury nature of the service, that the marking provisions of 52 Pa. Code §29.71 be waived.

Very truly yours,



Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG/tam

cc: Honorable Sheldon W. Farber  
Bureau of Non-Rail Transportation  
John T. Acton, Esquire  
Alan Squires, Esquire  
Herbert Somerson, Esquire  
Mr. Robert Euler  
Heather R. Kroncke, Esquire

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE:

Application of King Limousine  
Service, Inc.

:  
:  
:

PUC Docket No. A-105781

NOTICE OF WITHDRAWAL

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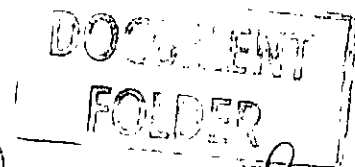
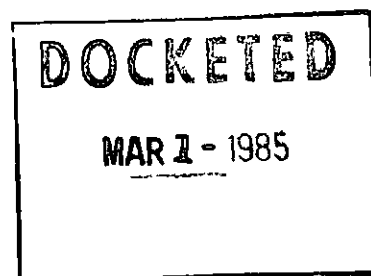
FEB 28 1985

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

SECRETARY'S OFFICE  
Public Utility Commission

I hereby withdraw the protests and intervention filed  
on behalf of the following parties, based on the acceptance of  
the restrictive amendment embodied in the letter attached hereto:

1. Delaware Valley Limousine Operators Association
2. Anthony S. Viscusi t/d/b/a Dav El Livery Service  
(Docket No. A-00099244, F.2)
3. Limelight Limousine, Inc. (Docket No. A-105268)
4. Best Limousine Company, t/d/b/a Dave's Limousine  
Service (Docket No. A-00105095, F.1 and F.2)



*Alan R. Squires*

ALAN R. SQUIRES, ESQUIRE  
GREENSTEIN, GORELICK, PRICE,  
SILVERMAN & LAVESON  
Attorneys for Petitioner  
and Protestants

Dated: 2-27-85

ORIGINAL

*John T. Acton*  
A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

JOHN T. ACTON  
EILEEN QUINN JUICO

(215) 659-4600

726 FITZWATERTOWN ROAD  
WILLOW GROVE, PA. 19090

March 4, 1985

Mr. Jerry Rich, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17120

Re: King Limousine Company, Inc.  
A-00105781

Dear Mr. Rich:

Based upon the Restrictive Amendments submitted to you by Gerald Gornish, Esquire in his letter of February 22, 1985 regarding the above-captioned application, Liberty Cab & Limousine Company agrees to withdraw its protest to the application conditioned upon acceptance by the Pennsylvania Public Utility Commission and any order issued being consistent therewith.

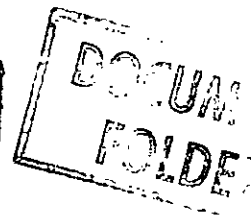
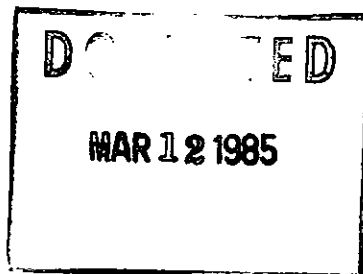
Liberty Cab & Limousine Company wishes to remain a part of record in this matter.

Sincerely yours,

*Eileen Quinn Juico*  
Eileen Quinn Juico

EQJ:sm

cc: Honorable Sheldon W. Farber  
Gerald Gornish, Esquire  
Mr. Carl Ackerman



ORIGINAL

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SOMERSON AND BOMZE, P.C.

SUITE 1300-1401 ARCH STREET

PHILADELPHIA, PA. 19102

HERBERT SOMERSON

IAY I. BOMZE

VAL PLEET WILSON

CHARLES L. TANNENBAUM\*

JANET W. STARWOOD

\*ALSO FLA BAR

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March 6, 1985

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SECRETARY'S OFFICE  
Public Utility Commission

Mr. Jerry Rich  
Secretary  
Pennsylvania Public Utility Commission  
Post Office Box 3265  
Harrisburg, Pennsylvania 17120

Re: King Limousine Service, Inc.  
A. 105781

Dear Mr. Rich:

I have this date received a restrictive amendment in the above-captioned application. Based on this restrictive amendment, the protestant, Harp Bros., Inc., hereby agree to withdraw their protest to this matter.

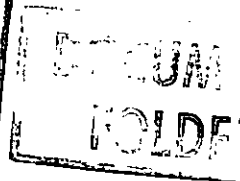
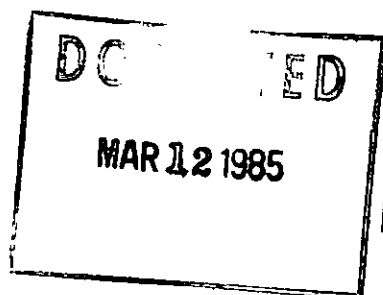
They would, however, like to remain a party to all proceedings.

Thank you for your attention to this matter.

Very truly yours,

  
HERBERT SOMERSON

tc  
cc: Gerald Gornish, Esquire  
Harp Bros., Inc.



## WOLF, BLOCK, SCHORR AND SOLIS-COHEN

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April 1, 1985

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## COUNSEL:

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DIRECT DIAL NUMBER:

(215) 977- 2118

*Applications*  
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APR 02 1985

*New Rail Transportation*  
**Public Utility Comm.**

Mr. Barry Ernst  
Director  
Bureau of Non-Rail Transportation  
Pennsylvania Public Utility Commission  
409 Transportation & Safety Building  
Harrisburg, PA 17120

Re: King Limousine Service, Inc.  
A-105781

Dear Mr. Ernst:

On February 28, 1985, I filed a restrictive amendment on behalf of the above. All protesting parties have withdrawn their protests based on such restrictive amendment.

I would accordingly request that your Bureau institute the modified procedure in this matter so that it may be presented to the Commission based on verified statements which I am in the process of preparing.

Thank you for your cooperation.

Very truly yours,

Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

**DOCUMENT  
FOLDER**

GG:lak

## WOLF, BLOCK, SCHORR AND SOLIS-COHEN

TWELFTH FLOOR PACKARD BUILDING  
S.E. CORNER 15TH AND CHESTNUT STREETS  
PHILADELPHIA, PA 19102

(215) 977-2000  
TELECOPIER: 977-2334  
TWX: 710-670-1927  
WOLBLORR PHA

FLORIDA OFFICE  
SUITE 1009  
1655 PALM BEACH LAKES BOULEVARD  
P.O. BOX 027516  
WEST PALM BEACH, FL 33402  
(305) 471-3400  
TELECOPIER: (305) 684-4503

DONALD BEAN  
BERNARD M. BORISH  
FRANKLIN POUL  
DANIEL C. COHEN  
STANTON S. OSWALD  
ALVIN H. DORSKY  
DAVID J. KAUFMAN  
CARL W. SCHNEIDER  
MICHAEL M. DEAN  
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DAVID A. HARRIS  
DAVID G. MANDELBAUM  
ROSS O. GOLDBERG  
JEROLD J. NOVICK  
MARK R. YANOWITZ

September 24, 1985

\*ADMITTED TO FLORIDA BAR ONLY  
\*\*ADMITTED TO FLORIDA & NEW YORK BARS ONLY  
†ADMITTED TO WASHINGTON, D.C. BAR ONLY  
††ADMITTED TO ILLINOIS & WASHINGTON, D.C. BARS ONLY

DIRECT DIAL NUMBER:

(215) 977- 2118

## COUNSEL:

ALFRED L. WOLF  
HELEN SPIGEL SAX  
NATHAN SILBERSTEIN  
ROBERT B. WOLF

SAMUEL H. LEVY  
MORRIS L. FORER  
JOSEPH BRANDSCHAIN

Mr. Barry Ernst  
Director  
Bureau of Non-Rail Transportation  
Room 409 Transportation & Safety Bldg.  
Harrisburg, PA 17120

Re: Application of King Limousine Service, Inc.  
A-105781

Dear Mr. Ernst:

In the above matter, all protests were withdrawn based on the filing of a Restrictive Amendment on February 28, 1985. I so advised you by letter of April 1, 1985 and indicated that the modified procedure could now be effectuated.

Accordingly, I enclose a verified statement of the carrier, King Limousine Service, Inc., together with verified statements of supporting witnesses, as follows:

1. Kurt Kurcher✓
2. B.J. Marchese Honda World
3. Nelson F. Swartley
4. Belmont Realty Co.
5. United Coin and Precious Metals ✓
6. Pottstown Contracting Co., Inc.✓
7. Edan Associates ✓
8. Charlene's Bridal Salon
9. A Shear Happening Associates

DOCUMENT  
FOLDER



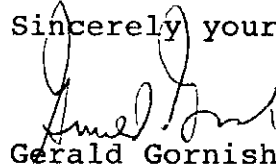
W. B. S. & S-C.

Mr. Barry Ernst  
September 24, 1985  
Page Two

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We would appreciate prompt consideration of this application. If there is any further information which is required, please advise.

Sincerely yours,



Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG:lak

Enclosures

cc: King Limousine Service, Inc.

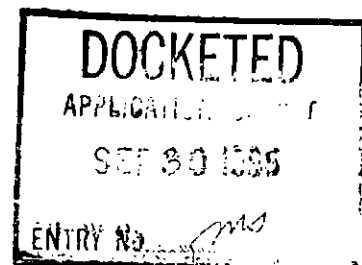
Heather Richmond Kroncke, Esquire

BEFORE THE PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

In Re: :  
: :  
Application of King Limousine : A-105781  
Service, Inc. :

The following statement is submitted to the Pennsylvania Public Utility Commission in accordance with 52 Pa. Code §3.381(e)(1) with respect to the above application:

1. The legal name and domicile of applicant are:  
King Limousine Service, Inc., a Pennsylvania corporation, with its offices at 129 West DeKalb Pike, King of Prussia, PA 19406, located in Montgomery County, Pennsylvania.
2. The person making this statement is Robert G. Euler, the president of King Limousine Service, Inc., and the person in charge of operations. I have been duly authorized to make this statement on behalf of the corporation.
3. King Limousine Service, Inc. operates as an independent corporation and is not affiliated with any other carriers.
4. Attached as Exhibit "A" are copies of the authority sought, both initially and as amended.
5. King Limousine Service, Inc. was granted an ICC license as a motor common carrier, on May 13, 1985, a copy of which is attached as Exhibit "B".



6. No duplicate authority will result from the requested grant of authority.

7. No dual operations will result from the granting of the requested authority.

8. The corporation has established offices at 129 West DeKalb Pike, King of Prussia, PA 19406. This would be used as the scheduling center as well as providing terminal facilities for the company's vehicles. Persons would be transported to and from points in the prescribed King of Prussia area. When a customer requests service a King Limousine driver would be dispatched to pick up the client and transport him to his destination. The driver would then be instructed to wait for the customer to transport him to another location or to return at a specified time if further limousine service is required. Service arrangements could either be scheduled in advance or made on a call-as-needed basis.

9. The company currently owns four (4) vehicles:

1985 Cadillac

1984 Lincoln Continental

1984 Excalibur

1983 Lincoln Continental

All of these are deluxe model stretch limousines.

10. Each King Limousine Service employee goes through a formal training period upon his/her joining the company. This involves

instruction in company procedures as well as safety precautions. Applicant will adhere to the Vehicle Code and all vehicles will be regularly inspected and maintained.

11. Currently, businesses or individuals in the area desiring limousine service must use other, often non-local limousine companies which frequently can not provide adequate service, either due to an insufficient number of vehicles or an inability to operate on an on-call basis. When these businesses or individuals are unable to obtain limousine transportation from existing services they can not provide their clientele the deluxe transportation they require.

12. The authority requested would allow King Limousine Service, Inc. to offer transportation in limousine service to persons between points in King of Prussia and within an airline distance of fifty (50) miles excluding service between points in the city and county of Philadelphia or to or from Philadelphia International Airport.

13. Current financial data is attached as Exhibit "C".

14. Empty miles or backhauls may occur; however, as the network is now structured, these should be infrequent.

15. King Limousine Service, Inc. has agreed to limit its service to the transportation of customers between points in King of Prussia and within an airline distance of fifty (50) miles, excluding points within the city and county of Philadelphia

and to or from Philadelphia International Airport. Within these restrictions, King Limousine Service, Inc. will provide a beneficial and needed service to the Montgomery County area.

Dated: Aug 28, 1985

Robert G. Euler  
Robert G. Euler

Sworn to and subscribed

before me this 28 day

of Aug., 1985.

[Signature]



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P. O. BOX 3265, HARRISBURG, Pa. 17120

January 14, 1985

IN REPLY PLEASE  
REFER TO OUR FILE

A. 105781

Calvin F. Drayer, Jr., Esquire  
One East Airy Street  
P.O. Box 389  
Norristown, PA 19404

Application of King Limousine Service, Inc.  
Right to begin to transport, persons in limousine service,  
between points in the village of King of Prussia, Upper  
Marion Township, Montgomery County, and within an airline  
distance of fifty (50) statute miles of the limits thereof.

N O T I C E

This is to inform you that an initial hearing on the  
above-captioned case on Wednesday, February 13, 1985, at  
10:00 a.m., in Room 1306, Philadelphia State Office Building,  
Broad and Spring Garden Streets, Philadelphia.

The presiding officer in this proceeding will be Adminis-  
trative Law Judge Sheldon W. Farber. Judge Farber can be con-  
tacted at 1302 Philadelphia State Office Building, Broad and  
Spring Garden Streets, Philadelphia, Pennsylvania 19130;  
telephone (215) 351-2105.

If you intend to file exhibits, please be advised that  
two copies of all hearing exhibits to be presented into  
evidence must be submitted to the Reporter and an additional  
copy should be furnished to the presiding officer and each  
party of record.

Exhibit "A"

RESTRICTIVE AMENDMENT

1. The applicant will not pick up any passengers at the following Chester, Montgomery and Bucks County areas for eventual transfer to the Philadelphia International Airport, nor deliver any passenger to the following areas whose passage originated at the Philadelphia International Airport; said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all of Chester County, and the Boroughs of Pottstown, Collegeville and Norristown, and the Townships of Upper Dublin, Whitmarsh, Montgomery, Upper Merion, Plymouth, Upper Moreland and Lower Gwynedd, Montgomery County, and the Townships of Bensalem, Doylestown, Warminster and Kulpsville in Bucks County.

James J. Paul for

King Insurance Service, Inc.

mailed to John E. Peter  
2/11/85

## WOLF, BLOCK, SCHORR AND SOLIS-COHEN

TWELFTH FLOOR PACKARD BUILDING  
S.E. CORNER 15TH AND CHESTNUT STREETS

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(305) 471-3400  
TELECOPIER (305) 884-4503

ASSOCIATED WITH ROZLOV, SEATON & ROMANINI P.C.  
(A FIRM OF NEW JERSEY ATTORNEYS)

February 27, 1985

ROBERT B. WOLF  
MITCHELL E. PANZER  
RAYMOND J. BRADLEY  
FRANKLIN M. SPITZER  
ROBERT E. WACHS  
ANTHONY S. MINISI  
ALBERT J. FELDMAN  
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## COUNSEL:

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\*ADMITTED TO FLORIDA BAR ONLY  
\*\*ADMITTED TO FLORIDA & NEW YORK BARS ONLY  
\*ADMITTED TO WASHINGTON D.C. BAR ONLY  
\*ADMITTED TO ILLINOIS & WASHINGTON D.C. BARS ONLY

DIRECT DIAL NUMBER:

(215) 977- 2118

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

Re: King Limousine Service, Inc.  
A-00105781

Dear Mr. Rich:

On behalf of my client, King Limousine Service, Inc.,  
I wish to submit the following restrictive amendments based  
upon which all protestants have agreed to withdraw:

To transport persons in limousine service,  
between points in the Village of King of  
Prussia, Upper Merion Township, Montgomery  
County, and within an airline distance of  
fifty (50) statute miles of the limits  
thereof; provided:

1. The applicant will not pick up any  
passengers at the following Chester, Montgomery  
and Bucks County areas for eventual transfer  
to the Philadelphia International Airport, nor  
deliver any passenger to the following areas  
whose passage originated at the Philadelphia

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FEB 28 1985

SECRETARY'S OFFICE  
Public Utility Commission



Jerry Rich, Secretary  
February 22, 1985  
Page Two


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International Airport; said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all of Chester County, and the Boroughs of Pottstown, Collegeville and Norristown, and the Townships of Upper Dublin, Whitemarsh, Montgomery, Upper Merion, Plymouth, Upper Moreland and Lower Gwynedd, Montgomery County, and the Townships of Bensalem, Doylestown, Warminster and Kulpsville in Bucks County; and

2. The applicant will not originate any transportation within the City and County of Philadelphia and will not pick up any passengers for eventual transfer to the Philadelphia International Airport from points within an airline distance of twenty (20) statute miles of City Hall in the City and County of Philadelphia, nor deliver any passenger whose passage originated at the Philadelphia International Airport to any point within an airline distance of twenty (20) statute miles of City Hall in said City and County.

Based on the above and the withdrawals of all protestants, I would request that this matter be handled through modified procedure. I would also request, in view of the luxury nature of the service, that the marking provisions of 52 Pa. Code §29.71 be waived.

Very truly yours,

  
Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG/tam

cc: Honorable Sheldon W. Farber  
Bureau of Non-Rail Transportation  
John T. Acton, Esquire  
Alan Squires, Esquire  
Herbert Somerson, Esquire  
Mr. Robert Euler  
Heather R. Kroncke, Esquire

MCB  
NH  
C

PM-34  
(Rev. 10/84)

INTERSTATE COMMERCE COMMISSION

DECISION

MC-182336

SERVICE DATE

MAY 15 1985

KING LIMOUSINE SERVICE, INC.  
King of Prussia, PA

Decided: May 13, 1985

Notice of a grant of motor common carrier authority in this proceeding was published in the ICC Register issue of March 21, 1985. Because of the unopposed status of this proceeding, the published grant of authority is now the final action of the Commission.

This decision does not constitute authority to operate. Operations may begin only following the issuance of a certificate which will be issued once compliance is made with the following requirements which are explained in the Code of Federal Regulations.

It is ordered:

Applicant must comply with the requirements pertaining to the appropriate insurance coverage (49 CFR 1043); the designation of agents upon whom process may be served (49 CFR 1044); and the filing of tariffs or schedules (49 CFR 1312). Compliance with these requirements must be accomplished before the final authority will be issued.

By the Commission, Heber P. Hardy, Director, Office of Proceedings.

JAMES H. BAYNE  
Secretary

(SEAL)

NOTE: Applicant may contact the nearest ICC Regional Office for assistance regarding compliance with these or other ICC requirements.

Insurance filings and designation of agents for motor carriers should be addressed to the Interstate Commerce Commission, Room B-221, ATTN: INSURANCE FILING, Washington, DC 20423.

If you need assistance in filing your insurance with the Commission, you may contact the Regional Compliance Officer in your Region:

Region 1

Joan Ruggiero  
(617) 223-2372  
Room 501  
150 Causeway Street  
Boston, MA 02114

Region 2

Lawrence Hawthorne  
(215) 596-4031  
Room 16400  
3535 Market Street  
Philadelphia, PA 19104

Region 3

William Bowles  
(404) 881-2167  
Room 300  
1776 Peachtree Street, N.W.  
Atlanta, GA 30309

Region 4

Annie Bocker  
(312) 353-6204  
Room 1304  
219 S. Dearborn Street  
Chicago, IL 60604

Region 5

Tommy Wood  
(817) 334-3961  
Suite 500  
411 W. 7th Street  
Fort Worth, TX 76102

Region 6

Joan Fair  
(415) 974-0958  
Suite 500  
211 Main Street  
San Francisco, CA 94105

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Tariff filings should be sent to the Interstate Commerce Commission, Bureau of Traffic, Section of Tariffs, Washington, DC 20423.

If you need assistance with your tariff filing, you may request a copy of the Tariff Instruction Manual by sending a stamped, self-addressed legal size envelope to the Interstate Commerce Commission, Bureau of Traffic, Room 4360, ATTN: TARIFF MANUAL, Washington, DC 20423.

# Seligman, Cupersmith, Wilensky & Company

CERTIFIED PUBLIC ACCOUNTANTS

## KING LIMOUSINE, INC. STATEMENT OF ASSETS AND LIABILITIES - INCOME TAX BASIS

DECEMBER 31, 1984

### ASSETS

#### CURRENT ASSETS

Cash

\$ 2,872

#### PROPERTY AND EQUIPMENT

Limousines

89,106

Accumulated depreciation

22,277

66,829

\$ 69,701

### LIABILITIES AND STOCKHOLDERS' EQUITY (DEFICIT)

#### CURRENT LIABILITIES

Current portion long-term debt

\$ 18,552

Note payable - officer -

27,775

Customer Deposits

873

Payroll and other taxes payable

1,553

TOTAL CURRENT LIABILITIES

48,753

LONG-TERM DEBT, net of current portion

36,347

#### STOCKHOLDERS' EQUITY (DEFICIT)

Common stock, no par value, 1,000 shares authorized,  
issued and outstanding

100

Deficit

( 15,499)

( 15,399)

\$ 69,701

Exhibit "C"

BEFORE THE PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

In Re:

Application of King  
Limousine Service, Inc.

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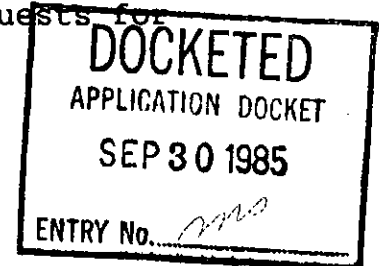
A-105781

The following statement is submitted to the Pennsylvania Public Utility Commission in support of the above application, which I understand would allow King Limousine Service, Inc. to offer transportation in limousine service to persons between points in King of Prussia and within an airline distance of fifty (50) miles, provided that no service shall be provided between points in the city and county of Philadelphia and generally no service will be provided to persons to or from Philadelphia International Airport or to or from points within twenty (20) miles of Philadelphia City Hall and certain specific points beyond that distance.

1. The person making this statement is Kurt Kurcher, 1430 Sugartown Road, Berwyn, Pennsylvania. I am a resident in the King of Prussia area and have a personal need for limousine service.

2. I need limousine service for personal transportation to restaurants and theaters throughout the Montgomery County area.

3. I would use King Limousine Service approximately seven (7) times per month for myself and my guests for



transportation to dinners, the theater and special nights out.

4. I require limousine service as needed, for myself and other persons between points in King of Prussia and an airline distance of fifty (50) miles.

5. I have supported no similar PUC applications.

6. Often on busy nights, particularly during weekends, I have had problems obtaining a car. A limousine company would only benefit the area.

Dated: 7/30/85

Kurt A. Kurcher  
Kurt Kurcher

Sworn to and subscribed  
before me this 30<sup>th</sup> day  
of July, 1985.

[Signature]

BEFORE THE PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

In Re:

Application of King  
Limousine Service, Inc.

A-105781

The following statement is submitted to the Pennsylvania Public Utility Commission in support of the above application, which I understand would allow King Limousine Service, Inc. to offer transportation in limousine service to persons between points in King of Prussia and within an airline distance of fifty (50) miles, provided that no service shall be provided between points in the city and county of Philadelphia and generally no service will be provided to persons to or from Philadelphia International Airport or to or from points within twenty (20) miles of Philadelphia City Hall and certain specific points beyond that distance.

1. The legal name of the supporting firm is B. J. Marchese Honda World, 1108 W. Main Street which is located in Norristown, Pennsylvania.

2. The person making this statement is Charles ~~Mouliere~~ <sup>Marchese</sup>. I am the manager of used car sales at B. J. Marchese Honda World, and have been duly authorized to make this statement on its behalf.

3. Honda World is a new and used car dealership. We need limousine service to transport service customers to and from their homes while their cars are in our garage for repair. We would also use King Limousine to transport and entertain factory sales representatives.

DOCKETED  
APPLICATION DOCKET  
SEP 30 1985

4. We would use King Limousine Service approximately three (3) times per week to transport our customers and business associates to and from locations throughout the Montgomery County area.


5. We require limousine service to our clients as needed by arrangement through us. This includes transportation to persons between points in King of Prussia and an airline distance of fifty (50) miles.

6. I have supported no similar PUC applications.

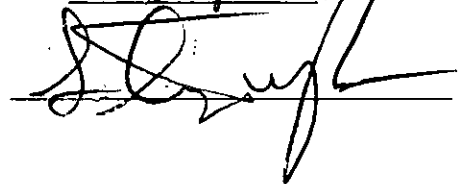
7. The rapidly developing Montgomery County area would benefit from such a service. Without limousine transportation we are forced to use our own vehicles which is often inconvenient and inefficient.

Dated: \_\_\_\_\_

7/15/85

  
Charles ~~Mouliere~~  
MARChese

Sworn to and subscribed  
before me this 15<sup>th</sup> day  
of July, 1985.





BEFORE THE PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

In Re:

Application of King  
Limousine Service, Inc.

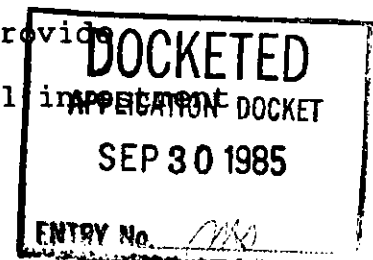
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The following statement is submitted to the Pennsylvania Public Utility Commission in support of the above application, which I understand would allow King Limousine Service, Inc. to offer transportation in limousine service to persons between points in King of Prussia and within an airline distance of fifty (50) miles, provided that no service shall be provided between points in the city and county of Philadelphia and generally no service will be provided to persons to or from Philadelphia International Airport or to or from points within twenty (20) miles of Philadelphia City Hall and certain specific points beyond that distance.

1. The legal name of the supporting firm is Nelson F. Swartley Real Estate, 556 Main Street which is located in Schwenksville, Pennsylvania.

2. The person making this statement is Nelson F. Swartley. I am the owner-operator of Nelson F. Swartley Real Estate, and am duly authorized to make this statement on its behalf.

3. Nelson F. Swartley Real Estate is a real estate brokerage firm. We need limousine service to provide transportation for clients to and from potential properties in the area.



4. We would use King Limousine Service to transport our clients to and from locations in the Montgomery County area approximately five (5) to six (6) times per month.

5. We require limousine service to our clients as needed and arranged by us. This includes transportation to persons between points in King of Prussia and an airline distance of fifty (50) miles.

6. I have supported no similar PUC applications.

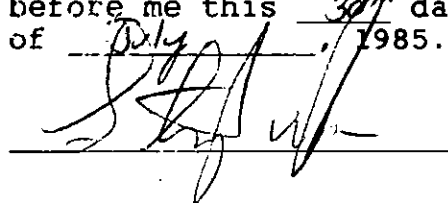
7. The area is continually developing and can only benefit from this service. King Limousine will enable us to provide better service to our clients.

Dated: \_\_\_\_\_

7/30/85

  
Nelson F. Swartley

Sworn to and subscribed  
before me this 30<sup>th</sup> day  
of July, 1985.



BEFORE THE PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

In Re:

Application of King  
Limousine Service, Inc.

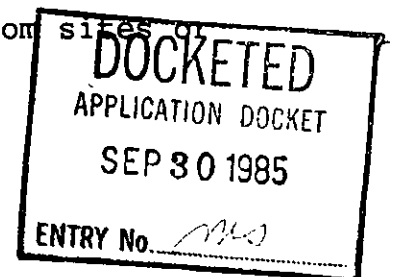
A-105781

The following statement is submitted to the Pennsylvania Public Utility Commission in support of the above application, which I understand would allow King Limousine Service, Inc. to offer transportation in limousine service to persons between points in King of Prussia and within an airline distance of fifty (50) miles, provided that no service shall be provided between points in the city and county of Philadelphia and generally no service will be provided to persons to or from Philadelphia International Airport or to or from points within twenty (20) miles of Philadelphia City Hall and certain specific points beyond that distance.

1. The legal name of the supporting firm is Belmont Realty Co., 1170 DeKalb Street which is located in Bridgeport, Pennsylvania.

2. The person making this statement is Rudolph A. DiGiacomo. I am the owner of Belmont Realty Co., and as such am duly authorized to make this statement on its behalf.

3. Belmont Realty Co. is a real estate brokerage firm. We need limousine service to transport potential land or commercial real estate purchasers to and from sites or project locations.



4. We would use King Limousine Service on a regular basis for transportation to and from locations throughout the entire Montgomery County area.

5. We require limousine transportation of our clients on an arranged basis. This includes transportation of persons between points in King of Prussia and an airline distance of fifty (50) miles.

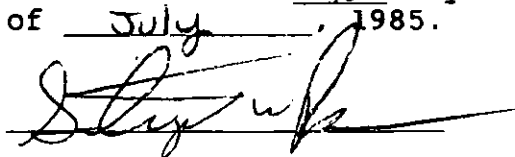
6. I have supported no similar PUC applications.

7. As the commercial growth in our area continues, the use of limousine service is important to many businesses. It would be a great asset to us to be able to obtain service without a long period of advance notice. Without limousine transportation available we are forced to use rental automobiles which often cannot accomodate our client groups. A rental car will seat only five (5) passengers and a driver, while the limousine will hold six (6) or more. This problem, along with the constantly rising rental prices, makes limousine transportation our preferred alternative.

Dated: 7/27/85

  
Rudolph A. DiGiacomo

Sworn to and subscribed  
before me this 26<sup>th</sup> day  
of July, 1985.



BEFORE THE PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

In Re:

Application of King  
Limousine Service, Inc.

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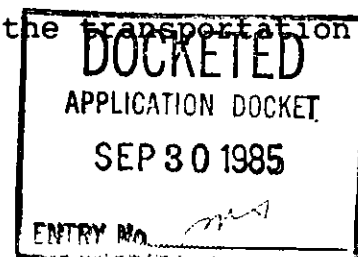
A-105781

The following statement is submitted to the Pennsylvania Public Utility Commission in support of the above application, which I understand would allow King Limousine Service, Inc. to offer transportation in limousine service to persons between points in King of Prussia and within an airline distance of fifty (50) miles, provided that no service shall be provided between points in the city and county of Philadelphia and generally no service will be provided to persons to or from Philadelphia International Airport or to or from points within twenty (20) miles of Philadelphia City Hall and certain specific points beyond that distance.

1. The legal name of the supporting firm is United Coin and Precious Metals which is located in Phoenixville, Pennsylvania.

2. The person making this statement is Chris Stevens. I am the owner of United Coin and Precious Metals, and as such am duly authorized to make this statement on its behalf.

3. United Coin is a coin and precious metal dealership. We need limousine service for the transportation of our clients to and from our shop.



4. We would use King Limousine Service twice a week to transport our customers between their homes or businesses throughout Montgomery County to our store.

5. We require limousine service for our clients as needed and arranged by us. This includes transportation to persons between points in King of Prussia and an airline distance of fifty (50) miles.

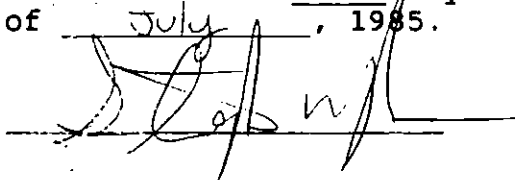
6. I have supported no similar PUC applications.

7. We want to be able to offer our customers complete service. Our clients appreciate deluxe transportation so a local limousine service would be a great benefit to our company.

Dated: 7-15-85

  
Chris Stevens

Sworn to and subscribed  
before me this 15<sup>th</sup> day  
of July, 1985.



BEFORE THE PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

In Re:

Application of King  
Limousine Service, Inc.

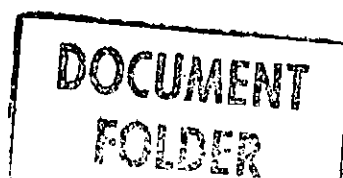
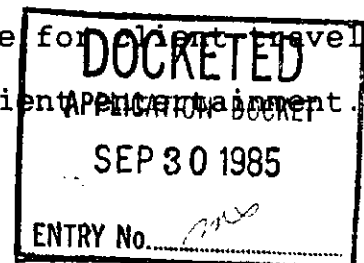
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: A-105781  
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The following statement is submitted to the Pennsylvania Public Utility Commission in support of the above application, which I understand would allow King Limousine Service, Inc. to offer transportation in limousine service to persons between points in King of Prussia and within an airline distance of fifty (50) miles, provided that no service shall be provided between points in the city and county of Philadelphia and generally no service will be provided to persons to or from Philadelphia International Airport or to or from points within twenty (20) miles of Philadelphia City Hall and certain specific points beyond that distance.

1. The legal name of the supporting firm is Pottstown Contracting Co., Inc. which is located in King of Prussia, Pennsylvania.

2. The person making this statement is Lawrence C. Mazzerle. I am the president of Pottstown Contracting Co., Inc., and I am duly authorized to make this statement on its behalf.

3. Pottstown Contracting Co. is a general contracting firm. We need limousine service for client travel during the course of business as well as client entertainment.



28

4. We would use King Limousine Service for the transportation of clients to and from restaurants and other locations throughout Montgomery County approximately four (4) times per month.

5. We require limousine service for our clients on an as needed and arranged basis. This includes transportation to persons between points in King of Prussia and an airline distance of fifty (50) miles.

6. I have supported no similar PUC applications.

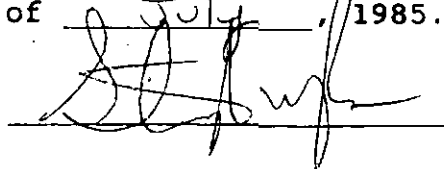
7. Due to the continued growth and commercial development in Upper Merion Township, the area needs this type of service. Taxicabs are not sufficient to meet our expanding needs.

Dated:

7-23-85

  
Lawrence C. Mazzerelle

Sworn to and subscribed  
before me this 23rd day  
of July, 1985.





BEFORE THE PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

In Re:

Application of King  
Limousine Service, Inc.

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A-105781

The following statement is submitted to the Pennsylvania Public Utility Commission in support of the above application, which I understand would allow King Limousine Service, Inc. to offer transportation in limousine service to persons between points in King of Prussia and within an airline distance of fifty (50) miles, provided that no service shall be provided between points in the city and county of Philadelphia and generally no service will be provided to persons to or from Philadelphia International Airport or to or from points within twenty (20) miles of Philadelphia City Hall and certain specific points beyond that distance.

1. The legal name of the supporting firm is Edan Associates which is located in King of Prussia, Pennsylvania.

2. The person making this statement is Eric Edan. I am the President of Edan Associates, and have been duly authorized to make this statement on its behalf.

3. Edan Associates is a business firm that deals in real estate and limited partnerships. We need limousine service to transport our clients to and from their homes or businesses to our office or potential investment sites.

DOCUMENT  
FOLDER

<b>DOCKETED</b>
APPLICATION DOCKET
SEP 30 1985
ENTRY No. <i>Ms</i>

4. We would use King Limousine Service approximately five (5) times per month for transportation to locations in and around King of Prussia.

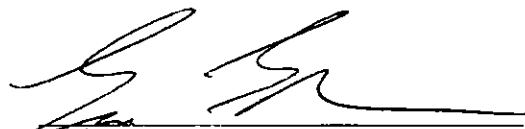
5. We require limousine service to our clients as needed and arranged by us. This includes transportation to persons between points in King of Prussia and an airline distance of fifty (50) miles.

6. I have supported no similar PUC applications.

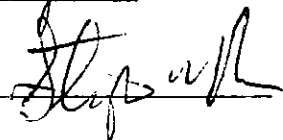
7. I know of no other limousine company in the area that can provide the type of service that we need. Our clients desire luxury transportation and King Limousine would allow us to provide complete, quality service to them.

Dated: \_\_\_\_\_

7/22/85

  
Eric Edan

Sworn to and subscribed  
before me this 22nd day  
of July, 1985.



BEFORE THE PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

In Re:

Application of King  
Limousine Service, Inc.

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: A-105781  
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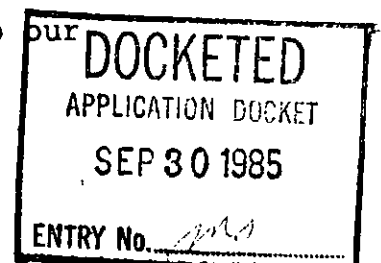
The following statement is submitted to the Pennsylvania Public Utility Commission in support of the above application, which I understand would allow King Limousine Service, Inc. to offer transportation in limousine service to persons between points in King of Prussia and within an airline distance of fifty (50) miles, provided that no service shall be provided between points in the city and county of Philadelphia and generally no service will be provided to persons to or from Philadelphia International Airport or to or from points within twenty (20) miles of Philadelphia City Hall and certain specific points beyond that distance.

1. The legal name of the supporting firm is Charlene's Bridal Salon, 1170 DeKalb Pike which is located in Bridgeport, Pennsylvania.

2. The person making this statement is Charlene Melle. I am the owner of Charlene's Bridal Salon, and am duly authorized to make this statement on its behalf.

3. Charlene's Bridal Salon is a bridal and tuxedo retail and rental shop. We need limousine service in order to provide complete wedding or prom arrangements to our customers.

DOCUMENT  
FOLDER



4. We would use King Limousine Service on a pre-arranged basis in response to our clients' requests for limousine service throughout the Montgomery County area.

5. We require limousine service to our clients as needed and arranged by us. This includes transportation to persons between points in King of Prussia and an airline distance of fifty (50) miles.

6. I have supported no similar PUC applications.

7. At this time, there is no local limousine service in the area and, due to the increasing popularity of limousine transportation for proms and weddings, I believe the service proposed by King Limousine is necessary for this area.

Dated:

7/14/85

Charlene Melle  
Charlene Melle

Sworn to and subscribed  
before me this 14<sup>th</sup> day  
of July, 1985.

[Signature]



4. We would use King Limousine Service for the transportation of clients at least once per week, to and from our salon.

5. Specific destinations requiring frequent service from our salon in Conshohocken are Plymouth, Norristown and King of Prussia.

6. We require transportation of our clients on an as needed basis to be arranged by us. This includes service to persons between points in King of Prussia and within an airline distance of fifty (50) miles.

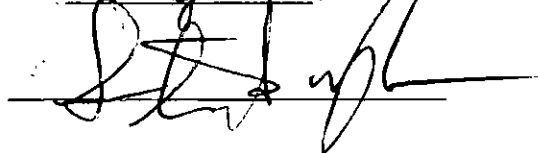
7. I have supported no similar PUC applications.

8. A local limousine service would be a great benefit to the specialized services we offer. King Limousine service would provide this, enabling us to provide better and more complete service to our customers.

Dated: 7/16/85

  
Joseph Madica

Sworn to and subscribed  
before me this 16<sup>th</sup> day  
of July, 1985.



## WOLF, BLOCK, SCHORR AND SOLIS-COHEN

TWELFTH FLOOR PACKARD BUILDING  
S.E. CORNER 16TH AND CHESTNUT STREETS  
PHILADELPHIA, PA 19102

(215) 977-2000  
TELECOPIER: 977-2334  
TWX: 710-670-1927  
WOLBLORR PHA

FLORIDA OFFICE  
SUITE 1009  
1655 PALM BEACH LAKES BOULEVARD  
P.O. BOX 027516  
WEST PALM BEACH, FL 33402  
(305) 471-3400  
TELECOPIER: (305) 884-4503

DONALD BEAN  
BERNARD M. BORISH  
FRANKLIN POUL  
DANIEL C. COHEN  
STANTON S. OSWALD  
ALVIN M. DORSKY  
DAVID J. KAUFMAN  
CARL W. SCHNEIDER  
MICHAEL M. DEAN  
MICHAEL L. TEMIN  
CHARLES G. KOPP  
ALAN J. DAVIS  
GERALD GORNISH  
ALAN H. MOLOD  
EDWARD M. GLICKMAN  
LOWELL M. OUBROW  
E. GERALD RIESENBAUGH  
JOSEPH M. MANKO  
RONALD M. WIENER  
WILLIAM J. MOREHOUSE  
STEPHEN M. GOODMAN  
ELLIOT S. GERSON  
LEONARD J. BUCKI  
WILLIAM A. ROSOFF  
PAUL E. SHAPIRO  
DONALD K. JOSEPH  
LOUIS COFFEY  
JUDITH R. COHN  
MARC M. SILBERT  
ROBERT MCL. BOOTE  
DAVID M. DORET  
DENNIS L. COHEN  
GREGORY T. MAGARITY  
LAURALEE A. MATTHEWS  
ARTHUR G. WROBLE\*  
HERMAN G. FALA  
STEVEN S. KING  
WILLIAM J. GREEN  
HENRY L. SHRAGER  
MICHAEL A. SUDIN  
ROBERTA D. LIESENBERG  
MATTHEW H. KAMENS  
DAVID N. HOFSTEIN  
THOMAS J. GALLAGHER, III  
BERNARD LEE  
JASON M. SHARGEL

MITCHELL E. PANZER  
RAYMOND J. BRADLEY  
FRANKLIN H. SPITZER  
ROBERT E. WACHS  
ANTHONY S. MINISI  
ALBERT J. FELDMAN  
ALLAN H. REUBEN  
HOWARD GITTIS  
SEYMOUR KURLAND  
GEORGE M. BRANTZ  
RAGAN A. HENRY  
LEONARD J. COOPER  
STEVEN A. ARBITTIER  
HENRY F. MILLER  
JAY L. GOLDBERG  
HENRY A. GLADSTONE  
H. ROBERT FIEBACH  
GERALD J. MCCONOMY  
BERNARD CHANIN  
DANIEL PROMISLO  
HAROLD JACOBS  
ROBERT C. PODWIL  
IVAN I. LIGHT  
JAMES A. ROSENSTEIN  
JOHN S. ROBERTS, JR.  
MICHAEL M. SHERMAN  
JAY R. BAER  
JAMES S. BURNS  
ALAN S. KAPLINSKY  
ARTHUR A. ZALTZ  
IAN A. L. STROGATZ  
RICHARD H. GLANTON  
DAVID R. GLYN  
MARC E. GOLD  
PHILIP E. GARBER  
BARRY F. SCHWARTZ  
ROBERT M. MCNAIR, JR.  
MARK A. ARONCHICK  
HOWARD BREGMAN  
ROBERT L. BLACKSBURG  
BRUCE S. KATCHER  
JOSEPH S. FINKELSTEIN  
BARRY M. KLAYMAN  
DAVID F. SIMON

ALBERT C. BRASLOW  
JEROME L. WOLF\*\*  
THOMAS WITT  
ARTHUR R. BLOCK  
ALAN I. GOLDBERG  
JEFFREY S. SALTZ  
MARK L. ALDERMAN  
RONA SKEEN YOUNG  
MELVYN J. TARNOPOL  
KENNETH J. WARREN  
ROBERT B. MCKINSTRY, JR.  
DAVID M. LAYMAN\*  
BARBARA S. LEONARD††  
NANCY O'MARA EZOLD  
JAMES G. WILES  
DAVID GITLIN  
WAYNE A. WEINER  
KEVIN C. MCCULLOUGH  
JOHN H. SCHAPIRO  
ANDREW J. DUBROFF  
SCOTT A. ISDANER  
M. ELLEN MOFFETT  
ABBE G. SHAPIRO  
NEIL S. WITKES  
DONALD BEAN, JR.  
GARY L. LOZOFF  
STEVEN P. BERMAN  
LAWRENCE G. BRAITMAN  
DAVID J. FELDMAN  
DEBRA KLEBANOFF  
MICHAEL A. HASSARA  
SCOTT W. CICHON\*  
KAY A. KORNMAN  
ELIZABETH A. RENAUD

ARNOLD J. ROSOFF  
ALAN SINGER  
JAMES OAKES  
M. NORMAN GOLDBERGER  
SANDRA A. BLOCH  
BURT M. RUBIN  
JEFFREY L. BRAFF  
DONALD M. MILLINGER  
ROBERT I. FRIEDMAN  
MARK R. ROSEN  
JEREMY T. ROSENBLUM  
ALFRED J. MALEFATTO\*  
PAMELA S. GOODWIN  
BRUCE GROHSSAL  
GERARD A. CHAMBERLAIN  
ROBERT A. SILVERMAN  
ANDREW A. CHIRLS  
HOWARD P. KAMINS  
AMY L. BRANTZ  
RONALD L. GERN  
PATRICK MATUSKY  
STEPHEN A. RITT, JR.  
JAMES R. WILLIAMS  
JEFFREY B. WOLIN  
KEITH A. JAMES  
ANTHONY R. TWARDOWSKI  
MARK F. BIDEAU  
MICHELE M. CLARK  
STEVEN N. HAAS  
DAVID A. HARRIS  
DAVID G. MANDELBAUM  
ROSS O. GOLOSBERG  
JEROLD J. NOVICK  
MARK R. YANOWITZ

October 25, 1985

\*ADMITTED TO FLORIDA BAR ONLY  
\*\*ADMITTED TO FLORIDA & NEW YORK BARS ONLY  
†ADMITTED TO WASHINGTON, D.C. BAR ONLY  
††ADMITTED TO ILLINOIS & WASHINGTON, D.C. BARS ONLY

DIRECT DIAL NUMBER:  
(215) 977- 2118

## COUNSEL:

ALFRED L. WOLF  
HELEN SPIGEL SAX  
NATHAN SILBERSTEIN  
ROBERT S. WOLF

SAMUEL H. LEVY  
MORRIS L. FORER  
JOSEPH BRANDSCHAIN

Herbert Somerson, Esquire  
1401 Arch Street  
Suite 1300  
Philadelphia, PA 19102

Alan R. Squires, Esquire  
900 Two Penn Center Plaza  
Philadelphia, PA 19102

John T. Acton, Esquire  
726 Fitzwatertown Road  
Willow Grove, PA 19090

RECEIVED

NOV 07 1985

Man-Rail Transportation  
Public Utility Comm

Re: King Limousine Service, Inc.  
A-00105781

Gentlemen:

In my letter of February 27, 1985 to the Public Utility Commission, I submitted a restrictive amendment based upon which you all agreed to withdraw your protests. It has been brought to my attention by the Commission staff that the following language in Paragraph 1 of the restriction is unclear: "said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all of Chester County,". This should, in fact, read "said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all in Chester County."

W. B. S. & S-C.

Herbert Somerson, Esquire  
Alan R. Squires, Esquire  
John T. Acton, Esquire  
October 25, 1985  
Page Two

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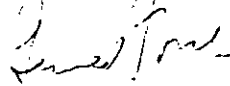
In addition, it was pointed out to me by staff that it is difficult to ascertain the limits of the Village of King of Prussia, PA. Accordingly, I have requested the Commission to amend the authority to read: "and within an airline distance of fifty (50) statute miles of applicant's office at 129 West DeKalb Pike, King of Prussia, PA.

Finally, there is a reference in Paragraph 1 to the Township of Kulpsville, Bucks County. I am advised by Commission staff (and corroborated by counsel who requested the restriction) that the reference should be to the Village of Kulpsville in Montgomery County.

Will you all kindly sign the attached copy of this letter which I am enclosing evidencing your concurrence in these changes to my letter of February 27, 1985 so that I may submit them to the Commission for further action.

Thank you for your anticipated cooperation.

Very truly yours,




Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG:lak  
Enclosure  
cc: King Limousine Service, Inc.  
Heather Richmond Kroncke, Esquire

I hereby concur in the terms and provisions of this letter.

  
John T. Acton, P.C.





COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P. O. BOX 3265, HARRISBURG, Pa. 17120

November 7, 1985

IN REPLY PLEASE  
REFER TO OUR FILE

Gerald Gornish, Esquire  
12th Floor, Packard Building  
15th and Chestnut Streets  
Philadelphia, PA 19102

Re: Application of King Limousine Service, Inc.; A-00105781

Dear Sir:

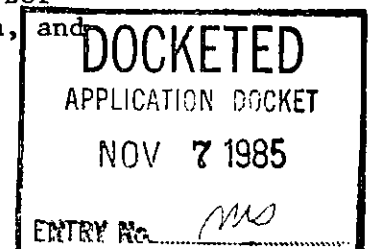
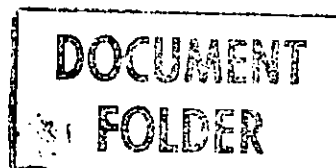
In reviewing the above application under modified procedure, discrepancies were noted in the caption and stipulations entered into the record by the referenced applicant. On October 7, 1985, we contacted your office to discuss these problems but you were on vacation. On October 23, 1985 you telephoned our office and advised that discrepancies in the caption and the restrictive amendments will be addressed and the parties of record notified so that they may indicate their concurrence with modifications submitted.

The purpose of this letter is to follow up on the foregoing and to advise you that this information shall be submitted on or before December 6, 1985. We shall reiterate the problems encountered for the record.

1. In the caption, transportation of persons is proposed between points in the village of King of Prussia and a radial of 50 miles of the limits thereof. As discussed, a village has no specific boundary lines and the point of reference will therefore be changed to the applicant's place of business. This will not require republication of the proceeding since the scope of service is thereby not increased.

2. The first restrictive amendment reads as follows:

The applicant will not pick up any passengers at the following Chester, Montgomery and Bucks County areas for eventual transfer to the Philadelphia International Airport, nor deliver any passenger to the following areas whose passage originated at the Philadelphia International Airport; said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all of Chester County, and the Boroughs of Pottstown, Collegeville and Norristown, and



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

the Townships of Upper Dublin, Whitemarsh, Montgomery, Upper Merion, Plymouth, Upper Moreland and Lower Gwynedd, Montgomery County, and the Townships of Bensalem, Doylestown, Warminster and Kulpsville in Bucks County

We believe the underscored all of Chester County should read "all in Chester County". In addition, Rand McNally indicates Kulpsville is a village in Towamencin Township, Montgomery County, and not a township in Bucks County as indicated.

3. Finally, since we believe that all of Philadelphia County is encompassed in the twenty mile radial of Philadelphia City Hall, this amendment should probably exclude service to Philadelphia International Airport from any point in said city and vice versa.

Should you have any questions regarding the above, we trust you will contact our office at (717) 787-4386.

Very truly yours,



For Barbara Honegger  
By Peter S. Marzolf, Supervisor  
Technical Review Section  
Bureau of Transportation

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

cc: Alan R. Squires, Esquire  
900 Two Penn Center Plaza  
Philadelphia, PA 19102

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Suite 1300  
1401 Arch Street  
Philadelphia, PA 19102

John T. Acton, Esquire  
726 Fitzwatertown Road  
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November 6, 1985

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DIRECT DIAL NUMBER:  
(215) 977- 2118

## COUNSEL:

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HELEN SPIGEL SAX  
NATHAN SILBERSTEIN  
ROBERT B. WOLF

SAMUEL H. LEVY  
MORRIS L. FORER  
JOSEPH BRANDSCHAIN

Ms. Barbara Honegger  
Pennsylvania Public Utility Commission  
409 Transportation & Safety Building  
Harrisburg, PA 17120

Re: King Limousine Service, Inc.  
A-00105781

Dear Ms. Honegger:

Pursuant to your request, I have agreed to three changes in the authority of my client as set forth in my letter to counsel of October 25, 1985, three copies of which I enclose, all of which have been signed and concurred in by counsel for the protestants in the matter. These relate to the clarification of the specific areas in Chester County, rather than all of Chester County; the determination of the center point of the 50 miles; and a clarification of Kulpsville.

With the enclosed change and concurrence of protestants, I would hope that the matter can be submitted to the Commission in the near future.

Thank you for your cooperation.

Very truly yours,

Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG:lak  
Enclosures

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Transportation  
Public Utility Comm.

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October 25, 1985

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Re: King Limousine Service, Inc.  
A-00105781

New-Jersey Transportation  
Public Utility Comm.

Gentlemen:

In my letter of February 27, 1985 to the Public Utility Commission, I submitted a restrictive amendment based upon which you all agreed to withdraw your protests. It has been brought to my attention by the Commission staff that the following language in Paragraph 1 of the restriction is unclear: "said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all of Chester County,". This should, in fact, read "said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all in Chester County."

W. B. S. & S-C.

Herbert Somerson, Esquire  
Alan R. Squires, Esquire  
John T. Acton, Esquire  
October 25, 1985  
Page Two

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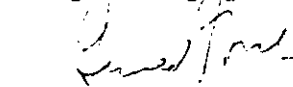
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Will you all kindly sign the attached copy of this letter which I am enclosing evidencing your concurrence in these changes to my letter of February 27, 1985 so that I may submit them to the Commission for further action.

Thank you for your anticipated cooperation.

Very truly yours,

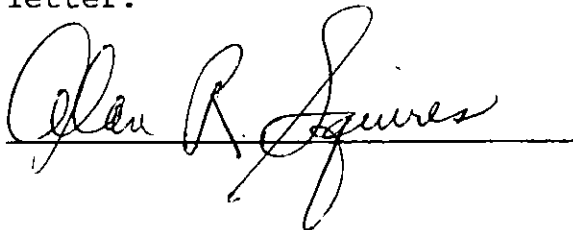


Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

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Enclosure  
cc: King Limousine Service, Inc.  
Heather Richmond Kroncke, Esquire

I hereby concur in the terms and provisions of this letter.



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ANTHONY R. THAROWSKI  
MARK F. BIDEAU  
MICHAEL M. CLARK  
STEVEN N. MAAS  
DAVID A. HARRIS  
DAVID G. MANDELBAUM  
ROSS G. GOLDBERG  
JEROLD J. NOVICK  
MARK R. YANOWITZ

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October 25, 1985

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NOV 07

Re: King Limousine Service, Inc.  
A-00105781

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Gentlemen:

In my letter of February 27, 1985 to the Public Utility Commission, I submitted a restrictive amendment based upon which you all agreed to withdraw your protests. It has been brought to my attention by the Commission staff that the following language in Paragraph 1 of the restriction is unclear: "said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all of of Chester County,". This should, in fact, read "said area includes the City of Coatesville, the Township of Schuylkill, the Township of Charlestown, all in Chester County."

W. B. S. & S-C.

Herbert Somerson, Esquire  
Alan R. Squires, Esquire  
John T. Acton, Esquire  
October 25, 1985  
Page Two

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In addition, it was pointed out to me by staff that it is difficult to ascertain the limits of the Village of King of Prussia, PA. Accordingly, I have requested the Commission to amend the authority to read: "and within an airline distance of fifty (50) statute miles of applicant's office at 129 West DeKalb Pike, King of Prussia, PA.

Finally, there is a reference in Paragraph 1 to the Township of Kulpsville, Bucks County. I am advised by Commission staff (and corroborated by counsel who requested the restriction) that the reference should be to the Village of Kulpsville in Montgomery County.

Will you all kindly sign the attached copy of this letter which I am enclosing evidencing your concurrence in these changes to my letter of February 27, 1985 so that I may submit them to the Commission for further action.

Thank you for your anticipated cooperation.

Very truly yours,

  
Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG:lak  
Enclosure  
cc: King Limousine Service, Inc.  
Heather Richmond Kroncke, Esquire

I hereby concur in the terms and provisions of this letter.

