

John A. Vuono
William A. Gray
*Mark T. Vuono**
Dennis J. Kusturiss
Louise R. Vuono
William H. Stewart, III
Erica G. Wilson
Paul J. Gitnik, Of Counsel

**Also Admitted in Florida*

Law Offices

VUONO & GRAY, LLC

310 Grant Street, Suite 2310
Pittsburgh, PA 15219-2383

Telephone
412-471-1800

Facsimile
412-471-4477

www.vuonogray.com

Email Address
wgray@vuonogray.com

September 23, 2016

Re: Advanced Notice of Temporary Rulemaking Order
Docket No. L-2016-2556432

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

MAILED WITH U.S. POSTAL SERVICE
CERTIFICATE OF MAILING FORM 3817

Dear Ms. Chiavetta:

We enclose for filing with the Commission the signed original of the Comments of Regency Transportation Group, Ltd. in connection with the Advanced Notice of Temporary Rulemaking Order at Docket No. L-2016-2556432.

Please acknowledge receipt and filing of the enclosed on the duplicate copy of this letter of transmittal and return it to the undersigned in the self-addressed, stamped envelope provided.

Very truly yours,

VUONO & GRAY, LLC


William A. Gray

as/168714

Enclosures

cc: Thomas Miller

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: ADVANCE NOTICE OF TEMPORARY RULEMAKING ORDER

DOCKET NO. L-2016-2556432

COMMENTS OF THOMAS MILLER ON BEHALF OF
REGENCY TRANSPORTATION GROUP, LTD.

The Commission published in the Pennsylvania Bulletin dated August 27, 2016, an Advance Notice of Temporary Rulemaking Order to promulgate temporary regulations consistent with Act 85 of 2016. The Advance Notice of Temporary Rulemaking Order provided that written comments can be submitted within 30 days of publication in the Pennsylvania Bulletin.

These Comments are being filed on behalf of Regency Transportation Group, Ltd. (hereinafter "Regency"). Regency has offices located at 1411 Beaver Avenue, Pittsburgh, PA 15233. Regency was first certificated to provide limousine service on December 9, 1996. It has provided limousine service regularly since that date.

Regency hereby submits that the Commission should change the limousine regulations to permit limousine companies to utilize flexible rates in the same manner as it permits TNC's to use flexible rates. Limousine companies provide service similar in many respects to TNC's but the one main difference is that limousine companies are required at all times to charge their published tariff rates while TNC's are not required to do so, which puts limousine companies at a

competitive disadvantage with TNC's. In addition, limousine companies must charge rates based solely on time and are specifically prohibited from charging mileage rates or flat rates. There is no legitimate reason for continuing to require limousine companies to charge the specific time based rates set forth in their tariffs and prohibiting them from charging mileage rates or flat rates while at the same time permitting TNC's to charge flexible rates. Regency therefore proposes in these comments that limousine companies be treated the same as TNC's from a tariff standpoint and be permitted to charge flexible rates rather than specific rates.

Respectfully submitted,

VUONO & GRAY, LLC

By: *William A. Gray*
William A. Gray, Esq.

Attorneys for
Regency Transportation Group, LTD.

VUONO & GRAY, LLC
310 Grant Street, Suite 2310
Pittsburgh, PA 15219
412-471-1800

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VERIFICATION

I verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.



Thomas Miller, President

Dated: _____

9/22/2016

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Pittsburgh, PA 15219-2383

TO:

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
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