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Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2013 NOV 25 PM 3:30

RE: RULEMAKING RE MOTOR CARRIER VEHICLE LIST
AND VEHICLE AGE REQUIREMENTS

DOCKET NO. M-2013-2349042

COMMENTS ON BEHALF OF
CLASSIC LIMOUSINE TRANSPORTATION, LLC

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I. STATEMENT OF THE CASE

The Commission published in the Pennsylvania Bulletin dated October 19, 2013 a Proposed Rulemaking Order to: (1) eliminate the vehicle list requirements for taxis and limousines in Sections 29.314(c) and 29.333(d); (2) eliminate the waiver exception for vehicle age limitation for taxis in Section 29.314(d); and (3) replace the vehicle age limitation for limousines in Section 29.333(e) with a vehicle mileage limitation.

The publication notice involving the Proposed Rulemaking Order provided that written comments had to be submitted within 30 days from the date of publication, which would be by November 18, 2013.

These Comments are being filed on behalf of *Classic Limousine Transportation, LLC* (hereinafter "Classic Limousine") in opposition to (3) above involving replacing the vehicle age limitation for limousines in Section 29.333(e) with a mileage limitation of 200,000 miles. This proposed change should be rejected.

II. FACTS INVOLVING CLASSIC LIMOUSINE

Classic Limousine has offices located at 1001 Third Avenue, Coraopolis, PA 15108-1468. Classic Limousine was first certificated to provide limousine service on November 26, 1996. Classic Limousine operates sedans, as well as SUV's (seating capacity of 5 or 6 passengers) and larger limousines and other larger vehicles at that facility. Classic Limousine keeps its vehicles in top operating condition.

Classic Limousine serves many corporate accounts, sports teams and entertainment accounts. They are very happy with its fleet and service. Classic Limousine's fleet is clean and well maintained. It has a full time mechanic that does a complete safety inspection, oil change, tire rotation or replacement etc. on all vehicles in its fleet every 4,000 miles.

III. POSITION OF CLASSIC LIMOUSINE

The Commission's Proposed Rulemaking Order would replace the vehicle age limitation with a vehicle mileage limitation of 200,000 miles. It is respectfully submitted that this change would have a dramatic adverse effect on existing limousine companies, including Classic Limousine, particularly in connection with the use of sedan limousines and SUV's, which are used on a daily basis primarily for repeat customers. Larger companies that have big corporate accounts accumulate a lot of miles on a yearly basis. Classic Limousine's fleet has 6 sedans and SUV's that either have or will soon have 200,000 miles. Having to eliminate these vehicles could put Classic Limousine out of business.

Classic Limousine sometimes has had safety problems with vehicles that were brand new and/or had low mileage. It is not just higher mileage vehicles that can have problems. Classic Limousines believes that a well maintained vehicle in its industry can run safely at least up to at least 300,000 miles. Classic Limousine would have no issue with a 300,000 mile limitation but believes the possibility of a 200,000 mile limitation will not only jeopardize Classic Limousine and the almost 50 office staff and drivers currently working for it but a lot of other good companies and their staff.

Classic Limousine objects to the mileage limitation of 200,000 miles insofar as it applies to sedans and SUV's since those are subject to higher mileage. Classic Limousine averages approximately 50,000 to 60,000 miles per year on each of its sedans and 40,000 to 50,000 on each of its SUV's. If the 200,000 mile limitation were applied to sedans and SUV's, Classic Limousine would have to replace the sedans and SUV's on average every 4 years or less. This is not economically feasible and does not make sense since many of the sedans and SUV's have a much longer useful life than 200,000 miles.

IV. ALTERNATIVE PROPOSAL

If the Commission is convinced that a mileage limitation is required, Classic Limousine suggests that the mileage limitation should be at least 300,000 miles.

V. CONCLUSION

For the reasons set forth herein, the proposed change to replace the vehicle age limitation for limousines with a mileage limitation of 200,000 miles should be rejected.

Respectfully submitted,

VUONO & GRAY, LLC

By: 

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Due Date: November 18, 2013

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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.



James R. Shento, President

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