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# Before the PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA.P.U.C. SECRETARY'S BUREAU

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

DOCKET NO. M-2013-2349042

COMMENTS ON BEHALF OF CRANBERRY TAXI, INC. T/A VETERAN'S TAXI AND CLASSY CAB COMPANY, INC.

## **I. STATEMENT OF THE CASE**

The Commission published in the <u>Pennsylvania Bulletin</u> 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 Cranberry Taxi, Inc. t/a Veteran's Taxi and Classy Cab Company, Inc. in opposition to (2) above involving eliminating the waiver exception for vehicle age limitation for taxis in Section 29.314(d). This proposed change should be rejected.

# II. FACTS INVOLVING CRANBERRY TAXI, INC. T/A VETERAN'S TAXI AND CLASSY CAB COMPANY, INC.

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Cranberry Taxi, Inc. t/a Veteran's Taxi (Cranberry Taxi) and Classy Cab Company, Inc. (Classy Cab) have their corporate offices located at 910 Sheraton Drive, Mars, PA 16046. Cranberry Taxi was first certificated to provide call or demand service in 2003. Classy Cab was first certificated to provide call or demand service in 2005. Both have provided call or demand service since they were certificated.

Cranberry Taxi and Classy Cab are pioneering the use of CNG and propane fueled taxicabs which will be more expensive and which will have engine lives in excess of 500,000 miles. CNG and propane burns clean and extends engine life by at least 50%. At the present time, Cranberry Taxi operates 30 such vehicles and while Classy Cab does not yet operate any such vehicles, it does operate 8 hybrids which also extend engine lives.

#### **III. POSITION OF CRANBERRY TAXI AND CLASSY CAB**

Cranberry Taxi and Classy Cab object to eliminating the waiver exception to the 8 year vehicle age limitation for taxis. Although all of their taxis are presently less than 8 years old, moving forward they will replace their taxis with CNG and propane fueled taxis which will have a much longer engine life and they may be more than 8 years old before needing to be replaced.

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## IV. CONCLUSION

For the reasons set forth herein, the proposed change to eliminate the waiver

exception for the vehicle age limitation for taxis should be rejected.

Respectfully submitted,

VUONO & GRAY, LLC By:

William A. Gray, Esq. Attorneys for Cranberry Taxi, Inc. t/a Veteran's Taxi and Classy Cab Company, Inc.

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

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.

Derck A. DeLucia, President

11/15/13 Dated:

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# neopost<sup>H</sup> 11/15/2013 US POSTACE FIRST-CLASS MAIL **\$01.12**<sup>⁰</sup> ZIP 15219 041L11221114 neopost<sup>17</sup> 11/15/2013 \$00.20<sup>°</sup> ZIP 15219 041L11221114 Law Offices **VUONO & GRAY, LLC** 310 Grant Street, Suite 2310 Pittsburgh, PA 15219-2383 Ms. Rosemary Chiavetta Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

TO: