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Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

DOCKET NO. M-2013-2349042

COMMENTS ON BEHALF OF
REGENCY TRANSPORTATION GROUP, LTD.

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 Regency Transportation Group, Ltd. (hereinafter "Regency") 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. Regency does not object to eliminating the vehicle age limitation for limousines but

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objects to the substituted mileage limitation, particularly for sedans. This proposed change should be rejected.

II. FACTS INVOLVING 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 operates 25 sedans, as well as larger limousines and other vehicles at that facility. Regency keeps its vehicles in top operating condition

Regency has 6 vehicles that are diesel fueled Mercedes sedans (all 2014 models except one 2012) which it fully expects will have a longer useful life than the normal limousine. It also has two additional diesel fueled Mercedes sedans on order which it will receive in the next couple of weeks.

Although Regency has a policy of replacing its vehicles much earlier than most of its competitors, it nevertheless has vehicles with mileage in excess of 200,000 miles. Of the 25 sedans that it operates, 9 are either 2012, 2013 or 2014. At the present time, it has 5 sedans with more than 200,000 miles. The oldest of these sedans is a 2008 and the newest is a 2011. In addition, it has 4 vehicles, 3 of which are 2011 models, which have more than 175,000 miles at the present time and which will go over 200,000 miles early in 2014. One of its sedans is a 2009, which is in excellent condition, and has 298,776 miles.

III. POSITION OF REGENCY

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 Regency, particularly in connection with the use of sedan limousines, which are used on a daily basis primarily for repeat customers.

Regency averages approximately 75,000 miles per year on each of its sedans. If the 200,000 mile limitation were applied to sedans, Regency would have to replace the sedans on average even before they are three years old. This is not economically feasible and does not make sense since many of the sedans, particularly the diesel fueled Mercedes sedans, have a much longer useful life than 200,000 miles. It doesn't make sense to replace these vehicles every 200,000 miles.

IV. ALTERNATIVE PROPOSAL

If the Commission is convinced that a mileage limitation is required, Regency 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: _____

William A. Gray, Esq.

Attorneys for

Regency Transportation Group, Ltd.

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Due Date: November 18, 2013

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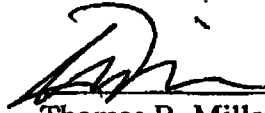
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VERIFICATION

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 B. Miller, President

Dated: 11/15/13

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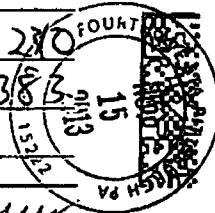
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