

3033

RECEIVED
IRRC

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2013 NOV 25 PM 3: 29

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

DOCKET NO. M-2013-2349042

COMMENTS ON BEHALF OF
STAR LIMOUSINE SERVICE, INC.

RECEIVED
2013 NOV 18 AM 11: 32
PA. P.U.C.
SECRETARY'S BUREAU

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 Star Limousine Services, Inc. (hereinafter "Star 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. Star Limousine objects to the substituted mileage limitation, particularly for sedans. This proposed change should be rejected.

II. FACTS INVOLVING STAR LIMOUSINE

Star Limousine has offices located at 910 Sheraton Drive, Mars, PA 16046. It was first certificated to provide limousine service in December, 2000 and has consistently provided limousine service since then. Star Limousine operates 11 sedans, as well as larger limousines and other vehicles at that facility. It keeps its vehicles in top operating condition.

Star Limousine is pioneering the use of CNG and propane fueled sedans 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%. Moving forward, Star Limousine will replace its sedans with CNG and propane fueled sedans.

Although Star Limousine has a policy of replacing its vehicles much earlier than most of our competitors, it nevertheless has sedans with mileage in excess of 200,000 miles. At the present time, 7 of its 11 sedans have more than 200,000 miles.

III. POSITION OF STAR LIMOUSINE

Star Limousine objects to the mileage limitation of 200,000 miles insofar as it applies to sedans since they are subject to higher mileage since they are used on a daily basis for repeat customers, many of whom are corporate accounts. Star Limousine averages approximately 50,000 miles per year on each of its sedans. If the 200,000 mile limitation were applied to sedans, Star Limousine would have to replace the sedans on average every 4 years. This is not economically feasible and does not make sense since many of the sedans have a much longer useful life than 200,000 miles. Also, Star

Limousine is financing these vehicles over 5 or 6 years and having to take the vehicle off the road after 4 years will result in financial problems.

IV. ALTERNATIVE PROPOSAL

If the Commission is convinced that a mileage limitation is required, Star Limousine suggests that the mileage limitation should be at least 350,000 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
Star Limousine Services, Inc.

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

Due Date: November 18, 2013

/130982

RECEIVED
2013 NOV 18 AM 11:33
PA.P.U.C.
SECRETARY'S BUREAU

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.



Derek A. DeLucia, President

Dated: 11/15/13

RECEIVED

2013 NOV 18 AM 11:33

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

RECEIVED
2013 NOV 18 AM 11:31
PA.P.U.C.
SECRETARY'S BUREAU

neopost[®]
11/15/2013

FIRST-CLASS MAIL

US POSTAGE

\$01.12⁰



ZIP 15219
041L11221114

Law Offices
VUONO & GRAY, LLC

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

TO:

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