

# Regulatory Analysis Form

(Completed by Promulgating Agency)

**INDEPENDENT REGULATORY  
REVIEW COMMISSION**

(All Comments submitted on this regulation will appear on IRRC's website)

(1) Agency  
PA Public Utility Commission (PUC or Commission)

(2) Agency Number: L-2013-2349042  
Identification Number: 57-296

IRRC Number: #3033

(3) PA Code Cite: 52 Pa Code § 29.314(c)-(d) and 52 Pa Code § 29.333(d)-(e)

(4) Short Title: Final Rulemaking Order Re Vehicle List, Age, and Mileage Requirements for Taxis and Limousines

(5) Agency Contacts (List Telephone Number and Email Address):

Primary Contact: Ken Stark, Law Bureau (717)-787-5558, [kenstark@pa.gov](mailto:kenstark@pa.gov)

Secondary Contact: Sherri Delbiondo, (717)-772-4597, [sdelbiondo@pa.gov](mailto:sdelbiondo@pa.gov)

(6) Type of Rulemaking (check applicable box):

Proposed Regulation

Final Regulation

Final Omitted Regulation

Emergency Certification Regulation;

Certification by the Governor

Certification by the Attorney General

(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)

The final regulations eliminate the vehicle list requirements for taxis and limousines; replace the 8-year vehicle age limitation for taxis with a 10-year age limitation or 350,000 mileage limitation, whichever comes first; and replace the 8-year vehicle age limitation for limousines with a mileage limitation of 350,000 miles. The final regulations incentivize the use of alternative fuel vehicles (AFVs) by allowing AFVs to operate in taxi service until reaching the age of 12 model years.

The regulations will be effective six months after promulgation to give limousines and taxis time to invest in new vehicles and replace current vehicles, as necessary.

(8) State the statutory authority for the regulation. Include specific statutory citation.

66 Pa. C.S. §§ 501, 1301, 1501, 2301.

52 Pa Code §§ 29.314(c)-(d), 29.333(d)-(e).

2015 FEB 27 AM 10:32

IRRC  
RECEIVED

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as, any deadlines for action.

The final regulations are not mandated by federal law or state law or court order, or federal regulation.

The Commonwealth Court has recently analyzed the regulations at issue in this rulemaking, providing helpful, concrete guidance and rules of law. See *Keystone Cab Serv. v. Pa. Public Utility Commission*, 54 A.3d 126, 128 (Pa. Cmwlth. 2012) (observing that the Commission carefully considered comments from the industry during the rulemaking process). In *Keystone Cab*, the appealing taxi carrier argued that the PUC could not impose stricter safety standards for vehicles used in public taxicab service than the Pennsylvania Department of Transportation (PennDoT) imposes on private vehicles for state inspections. *Id.* at 129. Importantly for purposes of this rulemaking, the Court clarified that PennDoT only establishes “minimum standards” for private vehicles. *Id.* (quoting 75 Pa. C.S. § 4101). The Court then held that the PUC may, under its statutory mandate in the Public Utility Code, impose stricter safety standards for vehicles used in public taxicab service. *Id.* at 128-129 (citing *Harrisburg Taxicab & Baggage Co. v. Pa. PUC*, 786 A.2d 288, 292 (Pa. Cmwlth. 2001), (citing 66 Pa. C.S. § 501, § 1501)).

In *Keystone Cab*, the Court observed that the correlation between a vehicle's age and mileage and its reliability and safety is a matter of common sense and practical experience. *Id.* at 129. Accordingly, the Court held that the Commission acted well within its statutory authority in imposing the eight-year age limitation on licensed common carriers. *Id.* at 128. Furthermore, the decision as to whether or not a carrier must replace a vehicle after eight years is a decision within the regulatory purview of the Commission and not a decision reserved exclusively to the carrier's management. *Id.*

**\*\*The statutory deadline for rulemaking action (i.e., the RegDead) is November 18, 2015.\*\***

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

The final regulations advance a compelling public interest by providing the Commission with a more viable and efficient tool to utilize in undertaking its difficult task of ensuring safe and reliable taxi and limousine service for the public. Thus, the Commission will save financial and human resources. There will be safer and better vehicles for public use. Eliminating the waiver exception for vehicle age will result in more, newer taxis in service. In light of more stringent fuel economy and emissions standards as well as the rising potential of alternative fuel vehicles (AFVs), environmental benefits may tangentially and indirectly flow from the final form regulation, as new vehicles and AFVs may become more widespread in taxi (call and demand) and limousine fleets, given our specified exemption of AFVs in the final form regulations. Replacing the age limitation for limousines with a mileage limitation will allow small businesses to use older, yet still safe, limousines for a longer duration, and thus save those small businesses money. See Questions 14-15 Answers.

Any attempt to quantify the specific benefits is speculative, though the PUC and thus the state government would save around \$35,000 per year. See Question 23 Answer. The segments of the public that utilize taxi and limousine service will benefit.

(11) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulations.

N/A. This is an intrastate issue that does not invoke federal jurisdiction.

(12) How does this regulation compare with those of the other states? How will this affect Pennsylvania's ability to compete with other states?

Generally, the vehicle age and mileage requirements for taxis and limousines in nearby jurisdictions are stricter than PUC's current requirements and the PUC's final form regulations in this rulemaking. In New York City, the New York City Taxi & Limousine Commission (TLC) promulgated a general rule that taxicabs must retire after 60 months (five years) of service. 35 R.C.N.Y. § 67-18(b). There are retirement date extensions, including a 12 month extension of allowable service for demonstration of a financial hardship by an independent taxicab owner or long-term driver, a 24 month automatic extension for use of a CNG vehicle, specific minivan extensions, and specific extensions for clean air and wheelchair accessible taxicabs. 35 R.C.N.Y. § 67-18(b). While there are no general mandatory vehicle age restrictions for limousines, there are significant vehicle alteration regulations as well as specific retirement schedules for certain vehicles. 35 R.C.N.Y. § 59A-28(a), (d). A limousine must be removed from service if the TLC or New York State Department of Motor Vehicles determines the vehicle is unsafe or unfit for use. 35 R.C.N.Y. § 59A-27(a)(1).

The Philadelphia Parking Authority (PPA), which regulates taxis and limousines operating in Philadelphia County, requires a taxicab to retire upon surpassing the age of eight model years or 250,000 miles. 52 Pa. Code § 1017.4(a). The PPA also has more extensive rules for vehicle entry mileage and basic vehicle standards. 52 Pa. Code §§ 1017.4(b), 1017.5. The PPA's vehicle age/mileage rules do not have language similar to the Commission's current "unless otherwise permitted" language that created the waiver program. However, the PPA does allow for petitions for waiver for antique vehicles. 52 Pa. Code § 1017.4(c). As to limousines, the PPA does not allow a limousine older than eight years to operate. 52 Pa. Code § 1055.3(b) (providing an exception for antique limousines that pass a compliance exception). The PPA also has a 350,000 cumulative mileage limitation for limousines. 52 Pa. Code § 1055.3(c) (allowing a one year extension for vehicles that pass a compliance inspection).

**\*\*These regulations should not affect Pennsylvania's ability to compete with other states.\*\***

(13) Will the regulation affect any other regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

No.

(14) Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. (“Small business” is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)

The Commission thoroughly reviewed the thirty-two public comments from interested parties and stakeholders. During the review of those comments, the Commission was very mindful of and sensitive to the concerns of the smaller carriers, IRRC, and the associations that represent some smaller taxi and limousine carriers. As demonstrated in our Order, we seriously considered the counter-proposals of the Greater Pennsylvania Taxicab Association, Central Pennsylvania Taxicab Association, and Philadelphia Regional Limousine Association and the Lehigh Valley Transportation Service. In our Final Rulemaking Order, we address and respond to the concerns of these interested parties.

Commission staff also informally, via phone calls and emails, reached out to mid-size and smaller taxi carriers who were concerned about the potential adverse financial impact of the regulations proposed in the April 5, 2013 Proposed Rulemaking Order. Specifically, Commission staff personally asked a few carriers to compare the costs and benefits of maintaining vehicles older than eight model years versus purchasing new vehicles. Burgit’s City Taxi of Wilkes-Barre, a mid-size carrier with approximately 15 vehicles, estimates that older vehicle maintenance costs are \$1,000 per month compared to new vehicle maintenance at \$350 or less per month. Burgit’s also estimated an approximate 35% in fuel savings by using the newer vehicles. Yellow Cab of Lebanon, a smaller carrier with approximately six vehicles, estimated a 40% reduction in maintenance costs due to a recent purchase of new vehicles. Both Burgit’s and Yellow Cab of Lebanon believe that their new vehicles have increased their businesses, as the public appreciates their new vehicles. Therefore, to avoid imposing an undue financial burden on smaller carriers under our regulatory purview, we reached out to carriers for specific information to ensure that an undue financial burden would not result upon enactment of our final form regulations.

(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation. How are they affected?

There are approximately 595 carriers that provide taxi and/or limousine service in the Commonwealth that would be affected by the final regulations. Out of these 595 carriers, approximately 295 operate taxi call and demand service and 417 operate limousine service.

The Regulatory Review Act, 71 P.S. § 745.3, invokes a definition of “small business” through a reference to Part 121 of the Code of Federal Regulations. Under Part 121 of the Code of Federal Regulations, an entity operating taxi and/or limousine service can be defined as “small business” so long as the entity and that entity’s affiliates realize no more than \$15 million in annual receipts. Thus, all carriers that have under \$15 million in annual receipts could be classified as “small business.”

For purposes of answering this question, PUC staff produced an Excel spread sheet (attached herein) that summarized the revenue information for all small passenger carriers operating in the Commonwealth of Pennsylvania for the years 2011, 2012, and 2013. Importantly, we only have the revenue information from those carriers based on their intrastate revenue from operating in the Commonwealth. We do not have information pertaining to their out-of-state revenue or revenue from other sources, services, or

operations, or revenue from affiliates. None of the small passenger carriers exceed more than \$15 million in annual revenues. Thus, under that metric and the information available to us, all carriers would be considered small businesses.

As a result of those misleading results, we have determined that a more appropriate and accurate metric defining small business for a Pennsylvania small passenger carrier is a carrier realizing \$500,000 or less in annual intrastate gross revenues. Based on this metric, approximately 543 out of the 595 carriers would be classified as small business, due to intrastate gross annual revenues for the year 2013 of \$500,000 or less. Importantly, approximately 143 of these small business carriers are inactive or unresponsive, realizing revenues of \$2 or less. Accordingly, there are approximately 300 active small business passenger carriers and 52 big business passenger carriers. However, of those 300 active small passenger carriers, some of those smaller carriers may have revenue sources from other operations or from activities in other states. Thus, some of those small passenger carriers may not actually operate under the financial constraints of a typical small business.

Eliminating the waiver exception for vehicle age will result in more, newer taxis in service (other than the taxis that are 10 years of age or less with fewer than 350,000 miles. In light of more stringent fuel economy and emissions standards as well as the rising potential of alternative fuel vehicles (AFVs), environmental benefits may tangentially and indirectly flow from the final form regulation, as new vehicles and AFVs may become more widespread in taxi (call and demand) and limousine fleets, given our specified extended age allowance for AFVs in taxi service in the final form regulations. Replacing the age limitation for limousines with a mileage limitation will allow small businesses to use older, yet still safe, limousines for a longer duration, and thus save those small businesses money. Carriers may have to invest more money in the near term, but should be able to save money in the long-term. Given the pace of this rulemaking, increasing the age limitation to 10 years for taxis, and our six month delay for the effective date of these regulations for taxis limousines, smaller carriers should not realize undue financial hardship in the immediate future.

(16) List the persons, groups or entities, including small businesses, that will be required to comply with the regulation. Approximate the number that will be required to comply.

There are approximately 595 motor passenger carriers that provide taxi and/or limousine service in the Commonwealth that would be affected by the final regulations. As discussed above, approximately 300 of those carriers are active small businesses and approximately 52 of those carriers are active big businesses.

Two organizations that may be impacted are the Pennsylvania Taxicab and Paratransit Association and the Philadelphia Regional Limousine Association.

(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.

Carriers in the short-term may have to invest in new vehicles. However, investing in newer fleets will actually help carriers in the long-term, as fewer maintenance and upkeep costs will be incurred (since older vehicles and vehicles with high mileage usually require more maintenance and service). The use

of newer vehicles also yields less down-time for the vehicles and therefore decreases the need for carriers to keep more back-up vehicles. As a result, carriers will realize higher revenues per vehicle and less overall expense and investment in maintenance and service. Burgit's City Taxi of Wilkes-Barre and Yellow Cab of Lebanon specifically testify to this, as discussed in Question 14 and our Final Rulemaking Order.

In regard to the elimination of the 8 model year waiver provision for taxicabs, the elimination of the waiver provision would likely require some companies to make an investment in vehicles sooner (than if the waiver were still available). However, the waiver provision was not a guarantee that the vehicle would be granted an inspection. In recent years, many waiver requests were denied. Since the 8 model year provision has been in existence since 2006, there has been ample time for taxi owners to adjust to the 8 year rule, and no longer rely on the waiver. Overall, the financial impact upon taxi owners will not be significantly adverse. The social impact upon taxi users will be very positive - customers who have the opportunity to ride in newer vehicles will likely be more inclined to use taxi service, which should serve as a boost for small and large municipalities, as well as to the service industries (restaurants, hotels, commercial stores, etc.) in those respective communities. Furthermore, we will incentivize the use of alternative fuel vehicles by exempting those vehicles from our vehicle age requirement for taxis.

In regard to the elimination of the 8 model year requirement and waiver for limousines (to be replaced by the 200,000 mileage cap requirement), the PUC acknowledges that we were too restrictive with the proposed 200,000 mileage cap in our Proposed Rulemaking. We determined that the 200,000 mileage cap would be financially adverse to certain limousine carriers, especially those that frequently operate sedan service. Accordingly, in our final form regulation, we increase the mileage limitation to 350,000 miles, based upon comments received, our own internal review and analysis, and the use of independent statistics. *See* Final Rulemaking Order, pages 28-34.

Furthermore, given the pace of this rulemaking, increasing the age limitation to 10 years for taxis, and our six month delay for the effective date of these regulations for taxis and limousines, smaller carriers should not realize undue financial hardship in the immediate future.

The benefits around this rulemaking include: 1) saving governmental resources by requiring less time and money around the regulation of waiver exceptions in taxi and limousine service and 2) public interest/safety protection resulting from an influx of newer, safer vehicles to accommodate the public. *See* 66 Pa. C.S. § 1501; *see* PUC Final Rulemaking Order at p. 15-18.

(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.

The final regulations advance a compelling public interest by providing the Commission with a more viable and efficient tool to utilize in undertaking its difficult task of ensuring safe and reliable taxi and limousine service for the public. There will be safer and better vehicles for public use. Eliminating the waiver exception for vehicle age will result in more, newer taxis in service. In light of more stringent fuel economy and emissions standards as well as the rising potential of alternative fuel vehicles (AFVs), environmental benefits may tangentially and indirectly flow from this final regulation, as new vehicles and AFVs may become more widespread in the taxi fleet.

These expected benefits to the public interest easily outweigh any adverse financial impacts to small carriers in the short-term that have to invest in new vehicles. In fact, investing in newer fleets will actually help small carriers in the long-term, as fewer maintenance and upkeep costs will be incurred.

(19) Provide a specific estimate of the costs and/or savings to the **regulated community** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

Costs to carriers in the short-term will revolve around the investment in new vehicles. However, investing in newer fleets will actually help carriers in the long-term, as fewer maintenance and upkeep costs will be incurred (since older vehicles and vehicles with high mileage usually require more maintenance and service). Furthermore, carriers have reported that carriers can actually save money in the long-term through investment in new vehicles. Please see the answer to question 17 for an idea as to potential savings to the regulated community.

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

Local governments will not be directly affected by the final regulations.

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

The state government, including the Public Utility Commission, will not incur additional costs as a result of these final regulations. The Commission will actually save time and resources by not processing as many waiver applications.

There will be significant savings to the PUC staff. A single waiver application can take anywhere from four hours to three days and require the work of multiple Commission staff and Enforcement Officers. In 2013, there were waiver requests from 89 carriers for 222 vehicles, which resulted in approximately **888** man hours just to process those requests internally by PUC technical staff. Eighty-five vehicles were not initially denied and were submitted to Enforcement Officers for inspection. Each of those vehicles required 2.5 hours of time for enforcement officers, which included travel time to the inspection site. Thus, Enforcement Officers spent approximately **212.5** hours annually inspecting and scheduling vehicles with waiver requests.

After passing inspection, PUC technical staff (including supervisorial staff) then spent about **42.5** hours reviewing the application and sending out certificates.

More hours are conducted by PUC attorneys in the PUC's Office of Special Assistants (OSA) when a waiver request is denied by the PUC's Bureau of Technical Services and thereafter appealed to the Commission. OSA received 19 cases in 2013 and 9 thus far in 2014. At OSA, each case requires approximately 10 man hours, as the OSA lead attorney first reviews the file and drafts the order, technical staff then review the draft, management then reviews the draft, cleric assistance rendered for formatting the document and duplicating, and then time for review by Commissioners' Assistants. There are approximately 10-12 appeals at the OSA/Commission level per year, resulting in

approximately 100 more man-hours per year.

Accordingly, approximately 1,243 hours are spent by all Commission staff under the existing waiver program.

The 888 man-hours were conducted by a PUC compliance specialist at a salary of about \$28/hour, equaling \$24,864 annually. The 212.5 man-hours were conducted at average enforcement officer salary of about \$24/hour, equaling \$5,100 annually. The 42.5 hours included supervisory review at a higher salary of around \$30/hour, equaling \$1,275 annually. Finally, the 100 hours of appeals included review by multiple persons (including supervisors and Commissioners' assistants) at a salary average of around \$42/hour, equaling \$4,200 annually. Please note these are estimates.

Under those assumptions and estimates (which were on the low end), monetary savings from elimination of the waiver program would amount to approximately **\$35,439 per year**. Importantly, this rough estimate does not include any evaluation of employee benefit reduction due to any consolidation of the existing employee complement that would result from elimination of the existing vehicle waiver program.

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

N/A. Any additional reporting, recordkeeping, or other paperwork would be *de minimus*.

(23) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY Year	FY +1 Year	FY +2 Year	FY +3 Year	FY +4 Year	FY +5 Year
<b>SAVINGS:</b>						
<b>Regulated Community</b>		Un-quantifiable long-term savings	Un-quantifiable long-term savings	Un-quantifiable long-term savings	Un-quantifiable long-term savings	Un-quantifiable long-term savings
<b>Local Government</b>	N/A					
<b>State Government</b>	N/A					
<b>Total Savings</b>	<b>\$35,439</b>	<b>\$35,439 + Long-term savings</b>	<b>\$35,439 + Long-term savings</b>	<b>\$35,439 + Long-term savings</b>	<b>\$35,439 + Long-term savings</b>	<b>\$35,439 + Long-term savings</b>
<b>COSTS:</b>						
<b>Regulated Community</b>	Some short-term	Minimal	Minimal	Minimal	Minimal	Minimal



	investment in new vehicles					
<b>Local Government</b>	N/A					
<b>State Government</b>	None to Minimal					
<b>Total Costs</b>	Minimal	Minimal	Minimal	Minimal	Minimal	Minimal
<b>REVENUE LOSSES:</b>						
<b>Regulated Community</b>	N/A					
<b>Local Government</b>	N/A					
<b>State Government</b>	N/A					
<b>Total Revenue Losses</b>	N/A					

(23a) Provide the past three year expenditure history for programs affected by the regulation.

Eliminating the Waiver Program will result in significant savings to the PUC in terms of financial and human resources. Estimating the expenditures attributed to the Waiver Program would be very speculative. Commission review of a waiver request can be a fairly extensive and time-consuming process, depending on the completeness of the application and the timing of the filing of the application. Commission denial of waiver applications are often appealed, resulting in more use of Commission time and resources expended on the Waiver Program. The entire Commission review process of vehicle age limitation waiver requests is thoroughly discussed in the Commission's Proposed Rulemaking.

Processing a single waiver application can take anywhere from four hours to three days and require the work of multiple Commission staff and Enforcement Officers. Approximately, 18,000-20,000 hours per year are spent processing waiver applications, conducting waiver inspections, and defending waiver appeals. For the 2011 year there were requests from 69 carriers for 230 vehicle waivers, requiring about 920 initial man hours by technical staff. For the 2012 year there were requests from 70 carriers for 216 vehicle waivers, requiring 864 initial man hours by technical staff. For the 2013 year, there were requests from 89 carriers for 222 vehicle waivers, requiring 888 initial man hours by technical staff.

For the 2013 Year, eighty-five vehicles (out of 222) were not initially denied and were submitted to Enforcement Officers for inspection. Each of those vehicles required 2.5 hours of time for enforcement officers, which included travel time to the inspection site. After passing inspection, PUC technical staff (including supervisory staff) then spent about 42.5 hours reviewing the application and sending out certificates of approval of the vehicles that passed inspection to the carriers.

More hours are conducted by PUC attorneys in the PUC's Office of Special Assistants (OSA) when a waiver request is denied by the PUC's Bureau of Technical Services. At OSA, each case requires approximately 10 man hours, as the OSA lead attorney first reviews the file and drafts the order, technical staff then review the draft, management then reviews the draft, cleric assistance rendered for formatting the document and duplicating, and then time for review by Commissioners' Assistants. There are approximately 10-12 appeals at the OSA/Commission level per year, resulting in approximately 100 more man-hours per year.

As discussed in our Proposed Rulemaking, less than 15% of vehicles requesting a waiver in 2012 passed the Commission's safety and reliability standards for taxis to operate in motor carrier service for the public. Given this extremely low passing rate, the Commission's administrative costs to manage the waiver program and the potential safety risks associated with the use of older taxis outweigh any public benefit of maintaining and administering the waiver program.

Importantly, in the final regulations, **the Commission would eliminate the Waiver Program and save financial and human resources, not incur additional costs and expenditures.** Commission staff has estimated that savings based on processing waiver applications amounts to approximately **\$35,439 per year.** See Answer to Question 21. Since proposing to eliminate the waiver program in our April 5, 2013 Order, we have seen a significant decrease in the number of waiver requests.

Program	FY -3	FY -2	FY -1	Current FY
Waiver Program	\$30,000-\$40,000 per year	\$30,000-\$40,000 per year	\$30,000-\$40,000 per year	\$30,000-\$40,000 per year

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

- (a) An identification and estimate of the number of small businesses subject to the regulation.
  - (b) The projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation, including the type of professional skills necessary for preparation of the report or record.
  - (c) A statement of probable effect on impacted small businesses.
  - (d) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation.
- (a) There are approximately 295 taxi carriers and 417 limousine carriers operating in the Commonwealth that would be affected by the final regulations.
  - (b) Since the regulations propose eliminating certain requirements (e.g., vehicle list) and paperwork (waiver applications), there will be significantly less projected reporting, recordkeeping, and other administrative costs required for compliance with the final regulations.

As discussed, costs to carriers in the short-term will revolve around the investment in new vehicles. However, investing in newer fleets will actually help carriers in the long-term, as fewer maintenance and upkeep costs will be incurred (since older vehicles and vehicles with high mileage usually require more maintenance and service). Furthermore, carriers have reported that carriers can actually save money in the long-term through investment in new vehicles. We do not foresee an immediately adverse financial impact on small businesses, given the pace of this rulemaking, increasing the age limitation to 10 years

for taxis, and the six month delay for the effective date of these regulations for taxis and limousines. Thus, smaller carriers should not realize undue financial hardship in the immediate future.

- (c) The Commission does not find there to be a less intrusive or less costly alternative method for achieving the purpose of the final regulations: streamlining Commission procedures to more effectively and efficiently use Commission resources in regulating motor carriers of passengers to ensure a safe and reliable taxi and limousine fleet for the public.

(25) List any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

In recognition of potentially adverse financial impact on small carriers in the short-term, the Commission emphasized in its proposed rulemaking that a carrier regulated by the Commission may still file a petition for waiver of a Commission regulation. 52 Pa. Code § 5.43 (providing rules governing petitions for issuance, amendment, repeal, or waiver of Commission regulations).

As to limousine service, we have replaced the 8 year mileage cap with a lenient 350,000 mileage limitation to accommodate small carriers with only a few older, yet still safe vehicles used in limousine service.

See Answer to Question 15 for more on impact on small businesses.

(26) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

We considered keeping the waiver provision language “unless otherwise permitted,” but still concluded that savings to Commission resources outweigh keeping the waiver provision language. We considered a strict 8 year age limitation with no exceptions, as proposed in our Proposed Rulemaking Order. However, in response to comments, we decided to incorporate a dual age/mileage limitation for taxis. A mileage requirement alone may be unfair to newer (and still safer) vehicles with higher mileage. An age requirement alone may take older, low-mileage (and still safe) vehicles off the road earlier than necessary.

As for limos, we proposed a 200,000 mileage limitation in the proposed rulemaking. Based on the comments finding this mileage limitation overly burdensome, we increased the mileage limitation to 350,000 miles in the final rulemaking. We find this to be a very accommodating and unburdening solution.

We sought guidance in the regulations established by the Philadelphia Parking Authority (PPA), the New York City Taxi & Limousine Commission, and various other jurisdictions, as discussed in our Final Rulemaking Order. We incorporated the spirit of those regulations, but found those regulations rather lengthy, verbose, and needlessly complex. Thus, we kept to our simple metric and solution, as provided in the final form regulations. Notably, our metric for taxis, 10 years or 350,000 miles, is modeled after the dual metric used by PPA (and previously approved by IRRC).

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

- a) The establishment of less stringent compliance or reporting requirements for small businesses;
- b) The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses;
- c) The consolidation or simplification of compliance or reporting requirements for small businesses;
- d) The establishment of performing standards for small businesses to replace design or operational standards required in the regulation; and
- e) The exemption of small businesses from all or any part of the requirements contained in the regulation.

There are no express provisions that exempt small businesses or provide preferential treatment to small businesses. However, we finalized these regulations with small businesses in mind. We increased the vehicle mileage limitation for limousines due to various comments by small carriers expressing financial concerns that would result from a 200,000 vehicle mileage limitation. We find that our final regulations contain simple metrics and requirements that provide regulatory certainty and provide sufficient time for carriers to prepare and invest before the carriers are required to comply with the final regulations. Given the pace of this rulemaking and our six month delay for the effective date of these regulations after publication in the *Pennsylvania Bulletin*, smaller carriers should not realize undue financial hardship in the immediate future. See Answers to Questions 15, 17, and 24.

A small carrier regulated by the Commission may still file a petition for waiver of a Commission regulation. 52 Pa. Code § 5.43 (providing rules governing petitions for issuance, amendment, repeal, or waiver of Commission regulations).

(28) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable.

Data is not the primary basis for this regulation. However, statistics are discussed in Numbers 21 and 23 of this Regulatory Analysis Form as well as in the Commission's Proposed Rulemaking and our Final Rulemaking Order.

(29) Include a schedule for review of the regulation including:

- A. The date by which the agency must receive public comments: Nov. 18, 2013
- B. The date or dates on which public meetings or hearings will be held:  
  
PUC Public Meetings in this rulemaking occurred on Apr. 4, 2013 and Nov. 13, 2014.  
  
The next IRRC Public Meetings occur on Feb. 26, 2015 and Mar. 19, 2015.
- C. The expected date of promulgation of the proposed regulation as a final-form regulation: January 2015
- D. The expected effective date of the final-form regulation: June 2015
- E. The date by which compliance with the final-form regulation will be required: December 2015
- F. The date by which required permits, licenses or other approvals must be obtained: N/A

(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation.

The regulation will be reviewed on an as-needed basis.

Utility Code	Utility Name	Utility Type	Service Type	2011				2012				2013			
				15 and less	16 and over	Total Revenue	Reported/Estimated	15 and less	16 and over	Total Revenue	Reported/Estimated	15 and less	16 and over	Total Revenue	Reported/Estimated
630002	A LIMOUSINE SERVICE, INC.	Taxi	Limousine	\$549,000		\$564,215	Reported	\$623,514		\$623,514	Reported	\$712,812		\$712,812	Reported
630017	ABIL LIMO CORP.	Taxi	Limousine	\$90,553		\$109,606	Reported	\$82,774		\$82,774	Reported	\$76,267		\$76,267	Reported
630046	BRAG, INC.	Taxi	Limousine	n/a		\$18,840	n/a	n/a		\$0	n/a	\$1		\$1	Estimated
630053	BAN CAB CO., INC.	Taxi	Taxi	\$0		\$18,966	Reported	n/a		\$0	n/a	\$0		\$0	n/a
630085	CHAMPAGNE LIMOUSINE SERVICE INC	Taxi	Limousine	\$70,437		\$88,509	Reported	\$69,664		\$69,664	Reported	\$90,657		\$90,657	Reported
630118	JONES LIMOUSINE SERVICE UNLIMITED INC	Taxi	Limousine	\$85,939		\$105,012	Reported	n/a		\$0	n/a	\$0		\$0	n/a
630128	AIRLINE ACQUISITION CO., INC.	Bus	Taxi	\$99,973		\$115,206	Reported	\$906,740		\$906,740	Reported	\$2,566,375		\$2,566,375	Reported
630167	ALI BABA TRANSPORTATION CO.	Taxi	Limousine	\$31,000		\$50,129	Reported	\$38,000		\$38,000	Reported	\$31,000		\$31,000	Reported
630173	ALLANA - MONIQUE CAB CO., INC.	Taxi	Taxi	\$18,015		\$37,156	Reported	\$19,565		\$19,565	Reported	\$20,090		\$20,090	Reported
630174	ALLEGHENY LIMOUSINES, INC.	Taxi	Limousine	\$172,676		\$187,894	Reported	\$195,123		\$195,123	Reported	\$526,191		\$526,191	Reported
630190	BUCKS TRANSIT CO., INC.	Taxi	Limousine	\$340,849		\$359,879	Reported	\$371,894		\$371,894	Reported	\$355,766		\$355,766	Reported
630211	JEFFRIES ENTERPRISES, INC.	Taxi	Limousine	\$347,484	\$15,000	\$362,484	Reported	\$318,474	\$13,000	\$331,474	Reported	\$341,887	\$4,942	\$346,829	Reported
630224	R JEAN RYAN	Taxi	Taxi	\$70,641		\$87,685	Reported	\$70,641		\$70,641	Estimated	\$77,705		\$77,705	Estimated
630236	LAZER LIMOUSINE SERVICES, INC.	Taxi	Limousine	\$163,628		\$183,096	Estimated	\$163,628		\$163,628	Estimated	\$179,991		\$179,991	Estimated
630269	GREEN, WALTER LARRY	Taxi	Limousine	\$103,105		\$120,160	Reported	\$126,450		\$126,450	Reported	\$132,650		\$132,650	Estimated
630285	H.I.P., INC.	Taxi	Taxi	\$4,000		\$23,101	Reported	\$4,000		\$4,000	Reported	\$4,000		\$4,000	Reported
630327	READING YELLOW CAB, INC.	Taxi	Taxi	\$1,600,880		\$1,620,481	Reported	\$1,404,426		\$1,404,426	Reported	\$1,297,619		\$1,297,619	Reported
630342	H.A.T. CAB COMPANY	Taxi	Taxi	\$0		\$19,087	Reported	\$0		\$0	Estimated	\$0		\$0	Estimated
630367	DELBO ASSOCIATES, INC.	Taxi	Taxi	\$139,770		\$157,642	Reported	\$167,146		\$167,146	Reported	\$243,861		\$243,861	Reported
630369	EXECUTIVE TRANSPORTATION COMPANY	Taxi	Limousine	\$3,420,000		\$3,439,020	Reported	\$1,333,800		\$1,333,800	Reported	\$877,580		\$877,580	Reported
630384	LARRY J WILLS	Taxi	Taxi	\$40,140		\$55,641	Reported	\$45,078		\$45,078	Reported	\$47,226		\$47,226	Reported
630441	BAKER'S TRANSPORTATION SVC INC	Taxi	Taxi	\$0	\$113,732	\$130,033	Reported	\$85,611	\$25,743	\$111,354	Reported	\$15,816	\$24,822	\$40,638	Reported
630475	KEITH A & LISA M HRYNDA	Taxi	Limousine	\$19,960		\$35,189	Reported	\$17,385		\$17,385	Reported	\$750		\$750	Reported
630524	HENDERSON LIMOUSINE SERVICE INC	Bus	Limousine	\$140,326		\$157,435	Reported	\$122,300		\$122,300	Reported	\$103,965		\$103,965	Reported
630527	PARK AVENUE LUXURY LIMOUSINE, INC	Taxi	Limousine	\$198,420		\$217,386	Reported	\$214,400		\$214,400	Reported	\$238,296		\$238,296	Reported
630545	LIMOUSINE SERVICES TRANSPORTATION, INC.	Taxi	Limousine	n/a		\$18,964	n/a	\$43,522		\$43,522	Reported	\$47,874		\$47,874	Estimated
630586	PARS TRANSPORT, INC.	Taxi	Taxi	\$0		\$19,153	Reported	\$0		\$0	Estimated	\$0		\$0	Estimated
630640	OSCAR M.V., INC.	Taxi	Taxi	\$1		\$19,121	Estimated	n/a		\$0	n/a	\$1		\$1	Estimated
630676	BEST LIMOUSINE COMPANY, INC.	Taxi	Limousine	\$109,200		\$128,335	Reported	\$107,320		\$107,320	Reported	\$127,703		\$127,703	Estimated
630730	BLAIR CAB INC	Taxi	Taxi	\$74,493		\$91,095	Estimated	\$74,493		\$74,493	Reported	\$81,942		\$81,942	Estimated
630778	GERMANTOWN CAB CO.	Taxi	Taxi	\$763,705		\$771,708	Reported	\$944,707		\$944,707	Reported	\$1,063,581		\$1,063,581	Reported
630881	DEMBSROS, INC.	Taxi	Taxi	\$38,573		\$57,634	Estimated	\$38,573		\$38,573	Estimated	\$100		\$100	Reported
630887	LOWER BUCKS TRANSPORTATION SERVICE INC.	Taxi	Taxi	\$693,708		\$712,715	Estimated	n/a		\$0	n/a	\$0		\$0	n/a
630929	BILLTOWN CAB CO., INC.	Taxi	Taxi	\$673,750		\$681,451	Reported	\$689,155		\$689,155	Reported	\$1,513,968		\$1,513,968	Reported
630941	ASTER CAB COMPANY	Taxi	Taxi	\$2,122		\$21,842	Reported	\$5,780		\$5,780	Reported	\$6,358		\$6,358	Estimated
630959	KETEMA CAB CO.	Taxi	Taxi	\$300		\$20,003	Reported	\$300		\$300	Reported	\$210		\$210	Reported
631025	WGM TRANSPORTATION, INC.	Taxi	Taxi	\$436,988		\$455,289	Reported	\$442,976		\$442,976	Reported	\$452,528		\$452,528	Reported
631028	CLARION COUNTY TAXI INC	Taxi	Taxi	\$139,306		\$155,560	Reported	\$148,921		\$148,921	Reported	\$149,610		\$149,610	Reported
631051	DASHMESH CAB CORP	Taxi	Taxi	\$1,655		\$20,771	Reported	\$1,680		\$1,680	Reported	\$1,681		\$1,681	Reported
631053	BYERS TAXI SERVICE, INC.	Taxi	Taxi	\$853,038		\$866,728	Reported	\$219,988		\$219,988	Reported	\$222,944		\$222,944	Reported
631091	BUCKS COUNTY SERVICES, INC.	Taxi	Taxi	\$300,000		\$319,020	Reported	\$312,000		\$312,000	Reported	\$631,800		\$631,800	Reported
631110	CAREY LIMOUSINE PHILA INC	Taxi	Limousine	\$2,263,346		\$2,282,375	Reported	\$2,232,665		\$2,232,665	Reported	\$2,305,679		\$2,305,679	Reported
631148	SAINT CAB, INC.	Taxi	Taxi	\$0		\$19,124	Reported	\$0		\$0	Reported	\$0		\$0	Estimated
631156	ALCELAS, INC.	Taxi	Taxi	\$0		\$19,124	Reported	\$12,194		\$12,194	Reported	\$1		\$1	Estimated
631188	EYL CAB CO.	Taxi	Taxi	\$1,342		\$20,424	Estimated	\$1,342		\$1,342	Estimated	n/a		n/a	n/a
631199	MILFORD TRI-STATE TAXI, INC.	Taxi	Taxi	\$17,928		\$30,426	Reported	\$6,334		\$6,334	Reported	\$0		\$0	Reported
631228	MICHAEL RICHARD GRAB	Taxi	Taxi	\$395,293		\$414,853	Reported	\$473,828		\$473,828	Reported	\$472,433		\$472,433	Reported
631249	DOWNA CAB CO.	Taxi	Taxi	n/a		\$19,151	n/a	n/a		\$0	n/a	\$18,040		\$18,040	Reported
631283	TRI COUNTY TRANSIT SERVICE, INC.	Taxi	Taxi	\$2,779,759		\$2,799,223	Reported	\$2,916,493		\$2,916,493	Reported	\$1,154,037		\$1,154,037	Reported
631311	JAMES A PANICHELLI	Taxi	Taxi	\$23,875		\$39,576	Reported	\$18,826		\$18,826	Reported	\$11,182		\$11,182	Reported
631325	LOCK HAVEN TAXI, INC.	Taxi	Taxi	\$119,992		\$137,737	Reported	\$97,744		\$97,744	Reported	\$110,447		\$110,447	Reported
631372	A.D. CAB CO.	Taxi	Taxi	n/a		\$19,141	n/a	\$0		\$0	Reported	\$0		\$0	Reported
631374	OSKAR & SOFIA, INC.	Taxi	Taxi	\$0		\$19,038	Reported	\$0		\$0	Reported	\$0		\$0	Reported
631394	KEY CAB CO.	Taxi	Taxi	n/a		\$19,114	n/a	n/a		\$0	n/a	\$1		\$1	Estimated
631402	MCCARTHY FLOWERED CABS, INC.	Taxi	Taxi	\$1,911,289		\$1,923,794	Reported	\$1,940,568		\$1,940,568	Reported	\$1,791,696		\$1,791,696	Reported
631406	RIZVI ENTERPRISES, INC.	Taxi	Taxi	\$35,425		\$54,451	Estimated	n/a		\$0	n/a	n/a		n/a	n/a
631407	CISNEY, JAMES CARL	Taxi	Taxi	\$39,453		\$57,032	Estimated	\$34,419		\$34,419	Reported	\$30,978		\$30,978	Reported
631432	DARLEEN C CHRISTY	Taxi	Taxi	\$83,860		\$99,762	Estimated	\$83,860		\$83,860	Estimated	\$79,181		\$79,181	Reported
631468	SONIA & K. ENTERPRISES, INC.	Taxi	Taxi	\$6,974		\$26,056	Reported	\$7,200		\$7,200	Reported	\$7,600		\$7,600	Reported
631510	HARJIT CAB CO.	Taxi	Taxi	\$130		\$19,212	Reported	\$459		\$459	Reported	\$489		\$489	Reported
631532	CAPITAL CITY CAB SERVICE INC	Taxi	Taxi	\$414,255		\$431,368	Reported	\$354,000		\$354,000	Reported	\$407,457		\$407,457	Reported
631534	BLAISE ROLISON	Taxi	Taxi	\$14,319		\$32,791	Reported	\$15,781		\$15,781	Reported	\$20,542		\$20,542	Reported
631575	CONSHOHOCKEN YELLOW CAB, INC.	Taxi	Taxi	\$23,000		\$42,403	Reported	\$8,792		\$8,792	Reported	\$10,500		\$10,500	Reported
631578	ADDIS CAB CO.	Taxi	Taxi	\$0		\$19,142	Reported	\$0		\$0	Reported	\$0		\$0	Estimated
631600	LIAT, INC.	Taxi	Taxi	\$1,380		\$20,320	Reported	\$1,410		\$1,410	Reported	\$1,520		\$1,520	Reported
631625	PHILLIP L & SANDRA J COOPER	Taxi	Taxi	\$32,478		\$48,624	Reported	\$28,655		\$28,655	Reported	\$0		\$0	Reported
631655	DHESI CAB CO.	Taxi	Taxi	\$0		\$19,082	Reported	n/a		\$0	n/a	n/a		n/a	n/a
631660	HAZLE YELLOW CAB COMPANY, INC.	Taxi	Taxi	\$243,127		\$243,127	Reported	\$234,312		\$234,312	Reported	\$209,414		\$209,414	Reported
631661	TIME SAVER TAXI, INC.	Taxi	Taxi	\$12,359		\$12,359	Reported	\$13,358		\$13,358	Reported	\$16,089		\$16,089	Reported
631664	ROSELUNE CAB, INC.	Taxi	Taxi	n/a		\$19,124	n/a	n/a		\$0	n/a	\$1		\$1	Estimated
631688	B & M TRANSPORT, INC.	Taxi	Taxi	\$128		\$19,244	Reported	\$1,087		\$1,087	Reported	\$929		\$929	Estimated
631706	SLOG ENTERPRISES, INC.	Taxi	Taxi	\$0		\$8,043	Reported	n/a		\$0	n/a	n/a		n/a	n/a
631722	HERBERT U. CRAFT, JR.	Taxi	Limousine	\$8,299		\$27,337	Estimated	n/a		\$0	n/a	n/a		n/a	n/a
631723	PLYMOUTH TAXI, INC.	Taxi	Taxi	\$64,950		\$83,601	Reported	\$56,375		\$56,375	Reported	\$58,875		\$58,875	Reported
631726	SHERGILL CAB CO.	Taxi	Taxi	\$250		\$19,332	Reported	n/a		\$0	n/a	n/a		n/a	n/a
631734	SHER GILL, Z. INC.	Taxi	Taxi	\$10,200		\$29,282	Reported	n/a		\$0	n/a	n/a		n/a	n/a
631740	FRANCIS E CRINER	Taxi	Taxi	\$31,308		\$46,974	Reported	\$40,761		\$40,761	Reported	\$39,786		\$39,786	Reported
631780	D'S LIMOUSINE SERVICE, LTD.	Taxi	Limousine	\$9,974		\$29,012	Estimated	\$3,200		\$3,200	Reported	\$0		\$0	Reported
631794	DANIELEWICZ, JAMES	Bus	Limousine	\$49,247		\$67,607	Estimated	\$46,201		\$46,201	Reported	\$82,437		\$82,4	

632138	SALGAN, INC.	Taxi	Taxi	\$2,082	\$21,198	Reported	\$1,630	\$1,630	Reported	\$1,663	\$1,663	Reported
632154	GLEN & GWEN TRANSPORTATION, INC.	Taxi	Taxi	\$949	\$19,606	Reported	\$89,500	\$89,500	Reported	\$89,790	\$89,790	Reported
632187	RAMTIN, INC.	Taxi	Taxi	\$0	\$19,004	Reported	\$0	\$0	Reported	\$0	\$0	Reported
632207	PAUL'S CAB SERVICE, INC.	Taxi	Taxi	\$193,078	\$210,879	Reported	\$143,050	\$143,050	Reported	\$154,607	\$154,607	Reported
632244	ASMAHA, INC.	Taxi	Taxi	\$360	\$8,394	Reported	\$165	\$165	Reported	\$327	\$327	Reported
632246	MANPREET CAB CO	Taxi	Taxi	\$9,127	\$28,209	Reported	\$1,248	\$1,248	Reported	\$1,037	\$1,037	Reported
632248	COLLEGEVILLE AIRPORT SERVICE	Taxi	Taxi	\$21,800	\$41,155	Estimated	\$21,800	\$21,800	Estimated	n/a	n/a	Reported
632296	EXECUTIVE TRANSPRTN SERVICES INC	Bus	Limousine	\$134,195	\$149,397	Reported	\$162,304	\$162,304	Reported	\$178,534	\$178,534	Estimated
632302	FAIRVIEW LIMOUSINE SERVICE, INC.	Taxi	Limousine	\$67,705	\$67,705	Reported	\$66,323	\$66,323	Reported	\$47,479	\$47,479	Reported
632305	ERIE TRANSPORTATION SERVICES INC	Taxi	Taxi	\$1,333,721	\$1,350,225	Reported	\$1,297,385	\$1,297,385	Reported	\$1,285,219	\$1,285,219	Reported
632354	AUTOCAB, INC	Taxi	Taxi	\$852,534	\$870,136	Reported	\$872,258	\$872,258	Reported	\$881,042	\$881,042	Reported
632356	BLUE & WHITE USA, INC.	Taxi	Taxi	\$332,283	\$348,884	Reported	\$332,283	\$332,283	Estimated	\$163,449	\$163,449	Reported
632363	CRANBERRY TAXI, INC.	Taxi	Taxi	\$424,248	\$440,294	Reported	\$514,686	\$514,686	Reported	\$1,032,321	\$1,032,321	Reported
632383	MCT TRANSPORTATION, INC. T/D/B/A MONTCO SUB	Taxi	Limousine	\$411,693	\$430,731	Estimated	\$366,650	\$366,650	Reported	\$190,859	\$190,859	Reported
632387	CH. ATA CAB CO.	Taxi	Taxi	\$283	\$19,407	Reported	\$283	\$283	Estimated	\$311	\$311	Estimated
632389	CH. RAZIA CAB CO.	Taxi	Taxi	\$285	\$19,409	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632397	Greensburg Yellow Cab Co	Taxi	Taxi	\$148,881	\$209,436	Reported	\$142,652	\$142,652	Reported	\$192,789	\$192,789	Reported
632400	POCONO CAB COMPANY LLC	Taxi	Taxi	\$319,114	\$337,415	Estimated	n/a	n/a	n/a	n/a	n/a	Reported
632401	AAA CAB CO.	Taxi	Taxi	\$73,685	\$93,149	Reported	\$101,167	\$101,167	Reported	\$107,758	\$107,758	Reported
632421	SAFODER ZAMAN & HADRI WAHEED	Taxi	Taxi	\$67,021	\$67,021	Estimated	\$67,021	\$67,021	Estimated	\$73,723	\$73,723	Estimated
632428	Pittsburgh Cab Company, Inc. t/a Metro Taxi	Taxi	Taxi	\$24,960	\$40,193	Reported	\$41,821	\$41,821	Reported	\$32,289	\$32,289	Reported
632432	MICKY CAB CORP	Taxi	Taxi	\$21,000	\$21,000	Reported	\$21,000	\$21,000	Estimated	\$23,100	\$23,100	Estimated
632433	IA TRANS CO INC	Taxi	Taxi	\$230	\$19,377	Reported	\$0	\$0	Reported	\$0	\$0	Reported
632441	BSP TRANS INC	Taxi	Taxi	\$19,115	\$19,115	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632454	LMB TAXI, INC.	Taxi	Taxi	\$280	\$19,286	Reported	\$280	\$280	Estimated	\$308	\$308	Estimated
632476	FIRST CLASS TAXI CAB COMPANY	Taxi	Taxi	\$180,945	\$199,958	Reported	\$160,958	\$160,958	Reported	\$1	\$1	Estimated
632481	ALI R. INC.	Taxi	Taxi	\$1	\$20,153	Estimated	\$1	\$1	Estimated	n/a	n/a	Estimated
632517	LAOBINA, INC.	Taxi	Taxi	\$5,031	\$24,185	Estimated	\$5,031	\$5,031	Estimated	\$5,534	\$5,534	Estimated
632520	FLUEHR, J.F., JR., F.F., III & T.R.	Taxi	Limousine	\$139,995	\$159,144	Reported	\$123,532	\$123,532	Reported	\$137,233	\$137,233	Reported
632537	DEEP CAB, INC.	Taxi	Taxi	\$1	\$8,081	Estimated	n/a	n/a	n/a	n/a	n/a	Reported
632544	MALIK CAB CO.	Taxi	Taxi	\$0	\$19,116	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632551	SAAS CAB CO.	Taxi	Taxi	\$4,290	\$23,334	Reported	\$4,290	\$4,290	Estimated	\$4,719	\$4,719	Estimated
632559	LEBERT ATKINSON	Taxi	Taxi	\$22,022	\$9,223	Reported	\$17,114	\$17,114	Reported	\$19,432	\$19,432	Estimated
632570	MG TRANS CO., INC.	Taxi	Taxi	\$0	\$18,966	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632578	GOOD CAB, LLC	Taxi	Taxi	\$7,250	\$24,354	Reported	\$5,735	\$5,735	Reported	\$7,891	\$7,891	Reported
632580	SURVEER CAB CO.	Taxi	Taxi	\$0	\$19,082	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632590	MAF TRANS, INC.	Taxi	Taxi	\$950	\$20,065	Reported	\$186	\$186	Reported	\$286	\$286	Reported
632602	LAN TRANS CO., INC.	Taxi	Taxi	\$862	\$19,978	Reported	\$203	\$203	Reported	\$214	\$214	Reported
632604	FRANKFORD LIMOUSINE SERVICE INC	Taxi	Limousine	\$4,337	\$23,461	Reported	\$2,800	\$2,800	Reported	\$13,831	\$13,831	Reported
632607	F & G ENTERPRISES INC	Taxi	Taxi	\$500	\$19,402	Reported	\$500	\$500	Reported	\$500	\$500	Reported
632609	HAPPY TRANS INC	Taxi	Taxi	\$180	\$19,207	Reported	\$180	\$180	Estimated	\$3,500	\$3,500	Reported
632621	COCKERHAM, THOMAS EDWARD	Taxi	Taxi	\$1,000	\$20,066	Reported	\$1,000	\$1,000	Estimated	\$0	\$0	Reported
632627	BOSTON COACH-PENNSYLVANIA CORP.	Taxi	Limousine	\$1,163,090	\$1,163,090	Reported	\$988,447	\$988,447	Reported	\$989,577	\$989,577	Reported
632636	TURBO TAXI, LLC	Taxi	Taxi	\$47,671	\$63,372	Reported	\$22,907	\$22,907	Reported	\$59,116	\$59,116	Reported
632642	ROAD TRANS, INC.	Taxi	Taxi	\$0	\$19,115	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632657	VB TRANS, INC.	Taxi	Taxi	\$0	\$19,115	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632663	VL TRANS, INC.	Taxi	Taxi	\$0	\$19,115	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632664	VALTRANS, INC.	Taxi	Taxi	\$0	\$18,966	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632669	FAD TRANS, INC.	Taxi	Taxi	\$902	\$20,017	Reported	\$221	\$221	Reported	\$202	\$202	Reported
632670	RAV TRANS, INC.	Taxi	Taxi	\$924	\$20,039	Reported	\$216	\$216	Reported	\$186	\$186	Reported
632672	GRACE TRANS, INC.	Taxi	Taxi	\$568	\$19,683	Reported	\$186	\$186	Reported	\$264	\$264	Reported
632687	B.M. ENTERPRISES, INC.	Taxi	Taxi	\$1,350,000	\$1,369,020	Reported	\$1,404,000	\$1,404,000	Reported	\$1,950,000	\$1,950,000	Reported
632689	ML TAXI, INC.	Taxi	Taxi	\$0	\$8,022	Reported	\$42,900	\$42,900	Reported	\$0	\$0	Reported
632694	FLOMAR CAB CO.	Taxi	Taxi	n/a	\$18,954	n/a	n/a	n/a	n/a	\$1	\$1	Estimated
632706	DIANA'S LIMOUSINE COMPANY	Taxi	Limousine	\$41,579	\$58,919	Estimated	\$70,150	\$70,150	Reported	\$100,723	\$100,723	Reported
632710	NAVID, INC.	Taxi	Taxi	n/a	\$19,002	n/a	\$296	\$296	Reported	\$326	\$326	Estimated
632726	GALANT CAB COMPANY	Taxi	Taxi	\$560	\$560	Reported	\$286	\$286	Reported	\$0	\$0	Reported
632737	SAJ TRANS, INC.	Taxi	Taxi	\$856	\$19,971	Reported	\$184	\$184	Reported	\$102	\$102	Reported
632744	ARINK, INC.	Taxi	Taxi	\$35,685	\$54,771	Reported	\$35,685	\$35,685	Estimated	\$2,274	\$2,274	Reported
632745	GARDEN SPOT EQUIPMENT AUCTION, INC.	Taxi	Limousine	\$324,161	\$341,683	Reported	\$940,893	\$940,893	Reported	\$379,986	\$379,986	Reported
632746	LA UNION TAXI LLC	Taxi	Taxi	\$0	\$18,603	Reported	\$248,024	\$248,024	Reported	\$264,387	\$264,387	Reported
632748	AMEER MALIK T/A ON TIME TRANSPORT CAB CO	Taxi	Taxi	\$205,898	\$225,253	Reported	\$200,072	\$200,072	Reported	\$219,026	\$219,026	Reported
632757	CLASSY CAB COMPANY, INC.	Taxi	Taxi	\$826,886	\$842,952	Reported	\$776,148	\$776,148	Reported	\$1,230,686	\$1,230,686	Reported
632758	Raink, Inc	Taxi	Taxi	\$46,590	\$65,676	Reported	\$46,590	\$46,590	Estimated	\$1,889	\$1,889	Reported
632760	PREMIUM TAXI, LLC	Taxi	Taxi	\$664,780	\$682,882	Reported	\$731,242	\$731,242	Reported	\$723,919	\$723,919	Reported
632761	D & L CAB CO, INC.	Taxi	Taxi	\$306,826	\$324,182	Reported	n/a	n/a	n/a	n/a	n/a	Reported
632762	AAA ALPINE TAXICAB COMPANY, LLC	Taxi	Taxi	\$35,415	\$35,415	Estimated	\$35,415	\$35,415	Estimated	\$65,720	\$65,720	Reported
632763	LINCOLN TAXI TRANSPORTATION LLC	Taxi	Taxi	\$32,749	\$50,951	Reported	\$65,780	\$65,780	Reported	\$29,000	\$29,000	Reported
632769	SAWINK, INC.	Taxi	Taxi	\$483,991	\$503,077	Reported	\$483,991	\$483,991	Estimated	\$684,100	\$684,100	Reported
632771	HARRISBURG CITY CAB, INC.	Taxi	Taxi	\$675,050	\$692,154	Reported	\$100,000	\$100,000	Reported	\$100,000	\$100,000	Reported
632773	RAMSES R KADDIS	Taxi	Taxi	\$20,113	\$38,579	Reported	\$16,758	\$16,758	Reported	\$22,840	\$22,840	Reported
632779	AMIGO TAXI, LLC	Taxi	Taxi	\$14,988	\$32,098	Reported	\$49,113	\$49,113	Reported	\$43,220	\$43,220	Reported
632786	BLACK DIAMOND CAB COMPANY, INC.	Taxi	Taxi	\$63,473	\$81,345	Reported	\$81,638	\$81,638	Reported	\$92,261	\$92,261	Reported
632792	AA TAXI, INC.	Taxi	Taxi	\$247,892	\$264,693	Reported	\$286,625	\$286,625	Reported	\$327,795	\$327,795	Reported
632794	JETWAY TRANSPORT, INC.	Taxi	Limousine	\$1,614,593	\$1,633,998	Reported	\$2,047,838	\$2,047,838	Reported	\$1,900,611	\$1,900,611	Reported
632799	LEHIGH VALLEY TRANSPORTATION SERVICES INC	Taxi	Limousine	\$411,837	\$429,855	Estimated	\$749,885	\$749,885	Reported	\$687,800	\$687,800	Reported
632803	HOMESTEAD TRANSPORTATION LLC	Taxi	Taxi	\$151,091	\$170,537	Reported	\$178,167	\$178,167	Reported	\$190,613	\$190,613	Reported
632822	UNITED TAXI COMPANY	Taxi	Taxi	n/a	\$18,103	n/a	\$81,700	\$81,700	Reported	\$89,870	\$89,870	Estimated
632828	SANTOMAURO P.J. & SNYDER B.E., CO	Taxi	Taxi	\$1	\$17,838	Estimated	n/a	n/a	n/a	n/a	n/a	Reported
633049	GOLD CROSS LIMOUSINE OF PA, INC	Bus	Limousine	\$79,568	\$124,039	Reported	\$87,794	\$87,794	Reported	\$73,869	\$73,869	Reported
633087	GREATER JOHNSTOWN YELLOW CAB INC	Taxi	Taxi	\$100,070	\$115,972	Estimated	\$100,070	\$100,070	Estimated	\$119,505	\$119,505	Reported
633185	ROBERT W HAFENSTINER JR	Taxi	Limousine	\$86,610	\$105,114	Reported	\$69,036	\$69,036	Reported	\$69,232	\$69,232	Reported
633450	DEMETRIOS J HERRON	Taxi	Limousine	\$17,387	\$35,405	Estimated	\$17,387	\$17,387	Estimated	\$19,126	\$19,126	Estimated
633717	LANGHORNE CAB CO., INC.	Taxi	Taxi	\$112,808	\$112,808	Reported	\$120,938	\$120,938	Reported	\$151,396	\$151,396	Reported
633832	JEREMOW, EDWARD	Taxi	Limousine	n/a	\$19,047	n/a	n/a	n/a	n/a	\$0	\$0	Reported
633835	P. S. JAGIELA ENTERPRISES INC	Taxi	Limousine	\$116,693	\$124,696	Reported	\$116,693	\$116,693	Estimated	n/a	n/a	Reported
633849	J.E.T. ENTERPRISES, INC.	Taxi	Limousine	\$219,212	\$236,290	Reported	\$195,220	\$195,220	Reported	\$263,355	\$263,355	Reported
633859	J & J LEASING & RENTALS, INC.	Taxi	Taxi	\$165,738	\$183,847	Reported	\$287,590	\$287,590	Reported	\$264,350	\$264,350	Reported
633864	J & LIVERY CORPORATION	Taxi	Limousine	\$295,353	\$314,319	Reported	\$270,638	\$270,638	Reported	\$325,500	\$325,500	Reported
633929	JOYCE, JAMES	Taxi	Limousine	\$86,683	\$101,910	Reported	\$70,896	\$70,896	Reported	\$49,898	\$49,898	Reported
634234	KING LIMOUSINE SERVICE, INC.	Bus	Limousine	\$575,916	\$595,322	Reported	\$896,136	\$896,136	Reported	\$1,360,998	\$1,360,998	Reported
634242	DESANTIS TRANSPORTATION, INC.	Taxi	Taxi	n/a	\$19,610	n/a	\$500,000	\$500,000	Estimated	\$234,770	\$234,770	Reported
634525	LANCASTER COUNTY TAXI SERVICE COMPANY INC	Taxi	Taxi	\$185,986	\$185,986	Reported	\$185,986	\$185,986	Estimated	\$204,585	\$204,585	Estimated
634578	LANSDALE YELLOW CAB CO., INC.	Taxi	Taxi	\$67,810	\$87,213	Reported	\$51,916	\$51,916	Reported	\$71,300	\$71,300	Reported
634645	LAIVISH, MICHAEL J.	Taxi	Limousine	\$234,842	\$253,816	Reported	\$191,088	\$191,088	Reported	\$201,808	\$201,808	Reported
634956	PENNYWISE SEDAN SERVICE LLC	Taxi	Limousine	\$104,524	\$123,484	Estimated	\$113,761	\$113,761	Reported	\$167,900	\$167,900	Reported
635071	MAPLE CITY TRANSIT, INCORPORATED	Taxi	Taxi	\$10,000	\$28,472	Estimated	\$30,000	\$30,000	Reported	\$27,000	\$27,000	Reported
635141	FANTASY LIMOUSINE SERVICE, INC.	Taxi	Limousine	\$7,236	\$22,837	Reported	\$3,843	\$3,843	Reported	\$3,633	\$3,633	Reported
635733	MODEL MANAGEMENT SERVICES, INC.	Taxi	Taxi	\$425,596	\$443,198	Reported	\$343,336	\$343,336	Reported	\$410,865	\$410,865	Reported
635906	MURRELL, INC.	Taxi	Limousine	\$4,288	\$23,439	Reported	\$2,378	\$2,378	Reported	\$1,140	\$1,140	Reported</

636720	POSTEN TAXI INC	Taxi	Taxi	\$1,154,234	\$1,154,234	Reported	\$1,154,234	\$1,154,234	Estimated	\$1	\$1	Estimated
636804	QUICK SERVICE TAXI COMPANY, INC	Taxi	Taxi	\$1,243,901	\$1,262,003	Reported	\$1,272,881	\$1,272,881	Estimated	\$1,353,231	\$1,353,231	Reported
636827	RAINBOW CAB, INC.	Taxi	Taxi	\$1,100,000	\$1,119,380	Reported	\$1,100,000	\$1,100,000	Estimated	\$1,167,552	\$1,167,552	Reported
636888	READING METRO TAXI CAB, INC.	Taxi	Taxi	\$253,323	\$272,924	Reported	\$587,648	\$587,648	Reported	\$609,294	\$609,294	Reported
637222	TRANSILIMOUSINE SERVICE INC	Taxi	Limousine	\$3,300	\$22,415	Reported	\$3,300	\$3,300	Estimated	\$2,858	\$2,858	Reported
637608	DAVID A SIMON	Taxi	Limousine	\$492,708	\$507,828	Reported	\$491,257	\$491,257	Reported	\$481,325	\$481,325	Reported
637899	STAR LIMOUSINE SERVICE, INC.	Taxi	Taxi	\$638,257	\$654,303	Reported	\$609,776	\$609,776	Reported	\$1,323,696	\$1,323,696	Reported
638064	SUPER CAB, INC.	Taxi	Taxi	\$118,837	\$135,879	Reported	\$127,625	\$127,625	Reported	\$122,943	\$122,943	Reported
638190	EDWARD C TOMASZEWSKI JR	Taxi	Limousine	\$0	\$19,134	Reported	\$0	\$0	Reported	\$0	\$0	Reported
638236	A TOUCH OF CLASS LIMO SER., INC.	Taxi	Limousine	\$17,134	\$34,189	Reported	\$22,277	\$22,277	Reported	\$2,216	\$2,216	Reported
638460	UNIQUE LIMOUSINE SERVICE, INC.	Bus	Limousine	\$596,533	\$613,639	Reported	\$642,053	\$642,053	Reported	\$680,127	\$680,127	Reported
638568	VETERAN'S CAB COMPANY, INC.	Taxi	Taxi	\$225,452	\$241,102	Reported	\$280,929	\$280,929	Reported	\$303,441	\$303,441	Reported
638586	R VINCENT CO INC	Taxi	Limousine	\$1,394	\$20,518	Reported	\$390	\$390	Reported	\$2,517	\$2,517	Reported
638701	WANISH LIMOUSINE SERVICE, LTD.	Bus	Limousine	\$286,412	\$305,876	Reported	\$239,846	\$239,846	Reported	\$338,919	\$338,919	Reported
638706	WANNA CAB, INC.	Taxi	Taxi	\$0	\$19,065	Reported	\$1	\$1	Estimated	\$0	\$0	Reported
638904	WHITE LINE TAXI & TRANSFER COMPANY INC	Taxi	Taxi	\$1,344,891	\$1,360,308	Estimated	\$1,344,891	\$1,344,891	Estimated	\$696,785	\$696,785	Reported
638946	WILLOW GROVE YELLOW CAB CO., INC	Taxi	Limousine	\$2,916,745	\$2,935,835	Reported	\$2,777,259	\$2,777,259	Reported	\$226,797	\$226,797	Reported
639035	CHRISTA LAUREN LIMOUSINE INC	Taxi	Limousine	\$4,785	\$23,787	Reported	\$4,785	\$4,785	Estimated	\$5,264	\$5,264	Estimated
639093	YELLOW CAB CO. OF LEBANON	Taxi	Taxi	\$123,955	\$140,997	Reported	\$177,316	\$177,316	Reported	\$149,044	\$149,044	Reported
639135	YELLOW CAB CO. OF PITTSBURGH	Taxi	Taxi	\$14,100,004	\$14,115,237	Reported	\$15,502,563	\$15,502,563	Reported	\$16,770,764	\$16,770,764	Reported
639319	MANOR VALLEY TAXI, INC.	Taxi	Taxi	\$351,768	\$367,433	Reported	\$305,355	\$305,355	Reported	\$40,066	\$40,066	Reported
639430	ZIDEK, DANIEL T.	Taxi	Limousine	\$93,744	\$109,434	Reported	\$81,598	\$81,598	Reported	\$91,629	\$91,629	Reported
639590	PREMIER LIMO INC	Bus	Limousine	\$38,687	\$56,388	Reported	n/a	n/a	Reported	n/a	n/a	Reported
639601	YORK CAB INC	Taxi	Taxi	\$49,032	\$66,434	Reported	\$61,233	\$61,233	Reported	\$52,139	\$52,139	Reported
639925	DIAMOND TAXI LLC	Taxi	Taxi	\$8,878	\$25,988	Reported	\$7,125	\$7,125	Reported	\$8,175	\$8,175	Reported
639927	DOLLAR TAXI LLC	Taxi	Taxi	\$11,581	\$28,691	Reported	\$6,922	\$6,922	Reported	\$7,255	\$7,255	Reported
639985	THE NEW YELLOW CAB LLC	Taxi	Taxi	n/a	\$17,102	n/a	\$23,400	\$23,400	Reported	\$10,800	\$10,800	Reported
640003	JMT PROPERTY CORP.	Bus	Limousine	\$49,051	\$66,161	Reported	\$41,012	\$41,012	Reported	\$30,737	\$30,737	Reported
640031	ALLWAYS TRANSPORTATION INC	Bus	Limousine	\$1,090	\$20,244	Estimated	\$1,090	\$1,090	Estimated	\$1,199	\$1,199	Estimated
640039	A. ROYAL LIMOUSINE LLC	Bus	Limousine	\$11,496	\$30,468	Reported	\$11,789	\$11,789	Reported	\$19,259	\$19,259	Reported
640065	ROSEWELL, W. DALE	Bus	Limousine	\$75,935	\$95,036	Reported	\$56,913	\$56,913	Reported	\$52,501	\$52,501	Reported
640073	BARKER BROTHERS, INC.	Bus	Taxi	\$262,766	\$278,967	Reported	\$52,033	\$52,033	Reported	\$262,003	\$262,003	Reported
640111	CELEBRATION LIMO SERVICE, INC.	Bus	Limousine	\$206,297	\$49,235 \$274,486	Reported	\$217,873	\$72,624 \$290,497	Reported	\$234,912	\$78,303 \$263,015	Reported
640117	KIRK LIVERY, INC.	Bus	Limousine	\$567,609	\$582,845	Reported	\$521,402	\$521,402	Reported	\$498,626	\$498,626	Reported
640132	CELEBRITY LIMOUSINE SERVICE INC	Bus	Limousine	\$2,260,849	\$2,280,204	Reported	\$2,580,166	\$2,580,166	Reported	\$2,722,473	\$2,722,473	Reported
640156	PENNSYLVANIA COACH LINES, INC.	Bus	Limousine	\$11,926	\$27,060	Reported	\$21,605	\$21,605	Reported	\$23,766	\$23,766	Estimated
640159	PRESTIGE LIMOUSINE, LLC	Bus	Limousine	\$89,956	\$108,894	Reported	\$91,550	\$91,550	Reported	\$92,471	\$92,471	Reported
640167	DONALD W LEMON	Bus	Limousine	\$63,388	\$78,737	Reported	\$28,406	\$28,406	Reported	\$26,241	\$26,241	Reported
640176	A-1 LIMOUSINE INC.	Bus	Limousine	\$760,733	\$769,273	Reported	\$755,387	\$755,387	Reported	\$775,074	\$775,074	Reported
640182	M J UNIS INC	Bus	Limousine	\$12,729	\$27,730	Reported	\$12,729	\$12,729	Estimated	\$4,050	\$4,050	Reported
640187	SALGALS, INC.	Bus	Limousine	\$103,881	\$120,987	Reported	n/a	n/a	Reported	n/a	n/a	Reported
640212	EAGLE LIMOUSINE & MOTORCOACH IN	Bus	Limousine	\$1	\$1	Estimated	n/a	n/a	Reported	\$0	\$0	Reported
640217	SUSQUEHANNA VALLEY LIMO, INC.	Bus	Limousine	\$221,699	\$239,550	Reported	\$220,191	\$220,191	Reported	\$273,925	\$273,925	Reported
640220	JJ SERAFIN INC	Bus	Limousine	\$213,710	\$232,414	Reported	\$210,504	\$210,504	Reported	\$132,912	\$132,912	Reported
640228	BLACK TIE LUXURY LIMOUSINE INC	Bus	Limousine	\$35,229	\$35,229	Reported	\$14,906	\$14,906	Reported	\$49,089	\$49,089	Reported
640236	CARS AND LIMOUSINES, INC.	Bus	Limousine	\$64,297	\$83,443	Reported	\$0	\$0	Reported	\$70,676	\$70,676	Reported
640242	ROSE LIMOUSINE SERVICES,THE INC	Bus	Limousine	\$93,139	\$111,845	Reported	\$103,718	\$103,718	Reported	\$76,835	\$76,835	Reported
640261	ALADDIN LIMO, INC.	Bus	Limousine	\$16,100	\$35,229	Reported	\$11,000	\$11,000	Reported	\$14,000	\$14,000	Reported
640283	GILBRIDE LIMOUSINE, INC.	Bus	Limousine	\$15,950	\$34,397	Reported	\$12,000	\$12,000	Reported	\$22,000	\$22,000	Reported
640285	DONOVAN L YAUKEY	Bus	Limousine	\$25,842	\$43,099	Reported	\$25,842	\$25,842	Estimated	n/a	n/a	Reported
640287	TERRY J KOVACH	Bus	Limousine	\$90,722	\$90,722	Estimated	\$90,722	\$90,722	Estimated	\$61,869	\$61,869	Reported
640303	C.W.G. HOLDINGS, INC.	Bus	Limousine	\$139,026	\$157,666	Reported	\$113,685	\$113,685	Reported	\$133,011	\$133,011	Reported
640304	DANIEL R KOEBLER	Bus	Limousine	\$26,520	\$42,577	Reported	\$22,107	\$22,107	Reported	\$23,212	\$23,212	Reported
640310	J&B LIMOUSINE SERVICE & AUTO LEASING INC	Bus	Limousine	\$172,539	\$190,559	Reported	\$170,423	\$170,423	Reported	\$168,923	\$168,923	Reported
640328	DODDS ASSOCIATES, INC.	Bus	Limousine	\$890,017	\$909,064	Estimated	\$890,017	\$890,017	Estimated	\$293,859	\$293,859	Reported
640332	COMFORT LIMOUSINE SERVICE, INC.	Bus	Limousine	\$20,110	\$39,554	Reported	\$20,110	\$20,110	Reported	\$19,340	\$19,340	Reported
640338	R.E.GRASSO, SR. & R.E.GRASSO JR	Bus	Limousine	\$2,580	\$21,725	Reported	\$4,725	\$4,725	Reported	\$1,865	\$1,865	Reported
640352	WALSHE, INC.	Bus	Limousine	\$0	\$19,422	Reported	\$3,000	\$3,000	Reported	\$5,000	\$5,000	Reported
640365	TIT INCORPORATED	Bus	Limousine	\$397,120	\$415,187	Reported	\$237,436	\$237,436	Reported	\$224,703	\$224,703	Reported
640369	TOUCH OF CLASS LIMO, INC.	Bus	Limousine	\$43,450	\$62,154	Reported	\$43,450	\$43,450	Estimated	\$25,000	\$25,000	Reported
640389	CLASSIC LIMOUSINE TRANSPORTATION LLC	Bus	Limousine	\$659,139	\$674,247	Reported	\$173,861	\$173,861	Reported	\$1,075,414	\$1,075,414	Reported
640394	SHELMAR CORPORATION	Bus	Limousine	\$36,550	\$51,786	Reported	\$35,750	\$35,750	Reported	\$38,440	\$38,440	Reported
640395	PETRILLI, JAMES A.	Bus	Limousine	\$19,800	\$38,001	Reported	\$18,500	\$18,500	Reported	n/a	n/a	Reported
640399	BEST OF TIMES CHAUFFURED LIMOUSINE SERVICE	Bus	Limousine	\$144,540	\$163,980	Reported	\$138,808	\$138,808	Reported	\$152,060	\$152,060	Reported
640411	BHPH, INC.	Bus	Limousine	\$6,474	\$24,726	Reported	\$6,054	\$6,054	Reported	\$10,310	\$10,310	Reported
640419	AIRPORT LIMOUSINE SERVICE, INC.	Bus	Limousine	\$23,624	\$38,857	Reported	\$39,127	\$39,127	Reported	\$707,518	\$707,518	Reported
640436	JOHN D SALAKI	Bus	Taxi	n/a	n/a	n/a	n/a	n/a	Reported	\$1	\$1	Estimated
640449	REGENCY TRANSPORTATION GROUP LTD	Bus	Limousine	\$2,037,202	\$2,052,435	Reported	\$2,539,021	\$2,539,021	Reported	\$3,014,489	\$3,014,489	Reported
640461	GALAXY LIMOUSINE, INC.	Bus	Limousine	\$162,679	\$181,736	Reported	\$155,424	\$155,424	Reported	\$151,493	\$151,493	Reported
640468	LEWIS LIMOUSINE, LLC	Bus	Limousine	n/a	\$15,320	n/a	\$57,376	\$37,811 \$95,187	Reported	\$63,114	\$41,592	Estimated
640477	ROADRUNNER EXPRESS, INC.	Bus	Limousine	\$22,330	\$42,131	Reported	\$18,290	\$18,290	Reported	\$15,261	\$15,261	Reported
640481	DYNASTY LIMOUSINE SERVICE, INC.	Bus	Limousine	\$216,980	\$236,300	Reported	\$151,350	\$151,350	Reported	\$125,358	\$125,358	Reported
640496	THREE RIVERS LIMOUSINE SERV INC	Bus	Limousine	\$0	\$15,241	Reported	\$0	\$0	Reported	\$0	\$0	Reported
640504	CONCORD LIMOUSINE, INC.	Bus	Taxi	\$315,134	\$334,172	Estimated	\$322,891	\$322,891	Reported	\$221,668	\$221,668	Reported
640539	GROVE STAGIA H.	Bus	Limousine	\$18,713	\$36,035	Reported	n/a	n/a	Reported	n/a	n/a	Reported
640581	HERBERT L JOSEPH II	Bus	Limousine	\$57,642	\$72,852	Reported	\$50,797	\$50,797	Reported	\$37,908	\$37,908	Reported
640584	RED CARPET LIMOUSINE CONNECTION INC	Bus	Limousine	\$43,976	\$43,976	Reported	\$54,720	\$54,720	Reported	\$57,218	\$57,218	Reported
640585	JAVY ENTERPRISES, INC.	Bus	Limousine	n/a	n/a	n/a	n/a	n/a	Reported	\$0	\$0	Reported
640594	ELITE COACH LIMOUSINE, INC.	Bus	Limousine	\$813,242	\$828,910	Reported	\$972,256	\$972,256	Reported	\$800,167	\$800,167	Reported
640603	DELAWARE VALLEY LIMOUSINE, INC.	Bus	Limousine	\$101,589	\$120,627	Reported	\$86,496	\$86,496	Reported	\$89,763	\$89,763	Reported
640630	BERSCHLER/SHENBERG FUNERAL CHPL	Bus	Limousine	\$600	\$600	Reported	\$300	\$300	Reported	\$325	\$325	Reported
640648	BAILEY COACH INC	Bus	Limousine	\$173,758	\$191,159	Reported	\$183,672	\$183,672	Reported	\$222,267	\$222,267	Reported
640650	MAJESTY COMPANY, INC.	Bus	Limousine	\$390,772	\$405,892	Estimated	n/a	n/a	Reported	n/a	n/a	Reported
640660	HALL, BEVERLY A. & LENGEL RICH	Bus	Limousine	\$60,214	\$77,287	Estimated	n/a	n/a	Reported	n/a	n/a	Reported
640673	BURGIT CITY TAXI INC	Bus	Taxi	\$946,606	\$965,308	Reported	\$1,244,601	\$1,244,601	Reported	\$1,527,525	\$1,527,525	Reported
640683	PESSOGNELLI, INC.	Bus	Limousine	\$22,983	\$40,385	Reported	\$24,603	\$24,603	Reported	\$25,066	\$25,066	Reported
640686	CONCORD COACH USA, INC.	Bus	Taxi	\$28,994	\$48,032	Estimated	\$18,700	\$18,700	Reported	\$10,460	\$10,460	Reported
640700	CARL R. BIEBER INC.	Bus	Taxi	\$680,028	\$699,558	Reported	\$892,964	\$892,964	Reported	\$253,903	\$253,903	Reported
640713	ROBERT E BRENNER JR	Bus	Limousine	\$1	\$18,975	Estimated	n/a	n/a	Reported	\$1	\$1	Estimated
640716	ADAMO LIMOUSINE, LTD.	Bus	Limousine	\$197,159	\$215,261	Reported	\$192,110	\$192,110	Reported	\$323,867	\$323,867	Reported
640720	U.S.A. LIMOUSINE ULTRA, INC.	Bus	Limousine	\$222,672	\$241,638	Reported	\$117,960	\$117,960	Reported	\$141,996	\$141,996	Reported
640723	RED ROSE LIMOUSINE SERVICE, INC	Bus	Limousine	n/a	\$15,317	n/a	\$2,000	\$2,000	Reported	\$2,000	\$2,000	Reported
640733	JAMES R KIMBLE	Bus	Limousine	\$126,100	\$145,190	Reported	\$126,100	\$126,100	Estimated	\$170,500	\$170,500	Estimated
640742	SCHUMACHER, JOHN	Bus	Limousine	\$1,941	\$200,013	Reported	\$1,941	\$1,941	Estimated	n/a	n/a	Reported
640759	DECHERT, SCOTT A.	Bus	Limousine	\$14,477	\$10,286 \$41,805	Reported	\$16,617	\$10,730 \$27,347	Reported	\$1	\$1	Estimated
640764	AMEDEO'S LIMOUSINE SERVICE, INC.	Bus	Limousine	\$283,500	\$302,880	Reported	\$221,495	\$221,495	Reported	\$195,522	\$195,522	Reported



640841	JOSEPH A TRAPUZZANO	Bus	Limousine	\$40,544	\$34,847	\$90,527	Reported	\$38,888	\$49,299	\$88,187	Reported	\$39,572	\$91,569	\$125,141	Reported
640848	TORTORICE LIMOUSINE INC	Bus	Limousine	\$111,000	\$19,200	\$145,333	Reported	\$21,800	\$102,000	\$123,800	Reported	\$22,500	\$78,000	\$100,500	Reported
640850	BEST RATE LIMOUSINE LLC	Bus	Limousine	\$93,198		\$111,707	Reported	\$93,198		\$93,198	Estimated	\$70,000		\$70,000	Reported
640869	PHILADELPHIA COACH LIMO, INC.	Bus	Limousine	\$227,623		\$246,629	Reported	\$381,127		\$381,127	Reported	\$483,224		\$483,224	Reported
640873	TRAVELER'S LIMO, LLC	Bus	Limousine	\$7,621		\$7,621	Estimated	\$26,860		\$26,860	Reported	\$28,847		\$28,847	Reported
640880	PAUL K BROWN INC	Bus	Limousine	\$7,182		\$22,318	Reported	\$6,800		\$6,800	Reported	\$13,800		\$13,800	Reported
640889	JOHN J VALASEK	Bus	Limousine	\$21,597	\$63,936	\$100,601	Reported	\$23,748	\$80,005	\$23,748	Reported	\$23,184	\$53,062	\$76,246	Reported
640900	DBH TRANSPORTATION, INC.	Bus	Limousine	\$90,890		\$110,491	Estimated	\$90,890		\$90,890	Estimated	n/a	n/a	\$0	n/a
640908	REACH FOR THE STARS LIMOUSINE SERVICE INC	Bus	Limousine	n/a	n/a	\$19,133	n/a	\$7,000		\$7,000	Reported	\$6,200		\$6,200	Reported
640916	ANDREWS, RODNEY P.	Bus	Limousine	\$199,601		\$199,601	Estimated	\$199,601		\$199,601	Estimated	n/a	n/a	\$0	n/a
640920	NATIONAL LIMOUSINE SERVICE INC.	Bus	Limousine	\$231,742		\$250,708	Reported	\$121,151		\$121,151	Reported	\$101,425		\$101,425	Reported
640923	LIMO 2000, INC.	Bus	Limousine	\$71,019		\$90,065	Reported	\$77,071		\$77,071	Reported	\$92,262		\$92,262	Reported
640944	RAYMOND LECH	Bus	Limousine	\$97,029		\$113,095	Reported	\$107,974		\$107,974	Reported	\$97,824		\$97,824	Reported
640951	LAWRENCE A WAITE	Bus	Limousine	\$77,370		\$92,576	Reported	\$103,410		\$103,410	Reported	\$85,923		\$85,923	Reported
640954	AAA COACH SERVICE, INC.	Bus	Limousine	\$48,917		\$67,978	Reported	\$29,094		\$29,094	Reported	\$45,500		\$45,500	Reported
640959	MOLNAR, PETER	Bus	Limousine	\$58,480		\$73,681	Reported	\$49,350		\$49,350	Reported	\$65,000		\$65,000	Reported
640964	LINDA G KREIN	Bus	Limousine	\$3,570		\$18,805	Reported	\$1,476		\$1,476	Reported	\$906		\$906	Reported
640974	HARPERS TRANSPORTATION INC	Bus	Limousine	\$97,921		\$113,137	Estimated	\$96,280		\$96,280	Reported	\$89,000		\$89,000	Reported
640976	ATLANTIC LIMOUSINE SERVICE INC.	Bus	Limousine	\$48,051		\$67,754	Reported	\$29,058		\$29,058	Reported	\$18,194		\$18,194	Reported
640978	SITLINGER, RUTH DIANE	Bus	Limousine	\$5,155		\$22,185	Reported	\$2,680		\$2,680	Reported	\$3,780		\$3,780	Reported
640979	GATEWAY LIMOUSINE SERVICE, LLC	Bus	Limousine	\$402,450		\$417,651	Estimated	\$400,752		\$400,752	Reported	\$433,410		\$433,410	Reported
640981	MM TRANSPORTATION, LLC	Bus	Limousine	\$50,000		\$69,066	Reported	\$50,000		\$50,000	Reported	\$1,000		\$1,000	Reported
640988	PARK PLACE LIMOUSINE SERVICE LLC	Bus	Limousine	\$20,000		\$38,901	Reported	\$21,000		\$21,000	Reported	\$20,000		\$20,000	Reported
640997	PASHA LUXURY SERVICES, INC.	Bus	Limousine	\$645,450		\$664,456	Reported	\$230,703		\$230,703	Reported	\$706,790		\$706,790	Reported
640998	ARRIVE IN STYLE LIMOUSINES, INC	Bus	Limousine	\$71,193		\$89,701	Reported	\$71,193		\$71,193	Estimated	\$35,600		\$35,600	Reported
640999	BLACK TOP LIMOUSINE, INC.	Bus	Limousine	\$4,804		\$23,949	Reported	\$4,804		\$4,804	Estimated	\$84,180		\$84,180	Reported
641011	VINCE ANDREW MARINI	Bus	Limousine	\$24,101	\$16,068	\$56,294	Reported	\$23,368	\$15,578	\$38,946	Reported	\$23,853	\$15,902	\$39,755	Reported
641024	LEA C MORGAN	Bus	Limousine	\$204,523		\$219,660	Estimated	\$204,523		\$204,523	Estimated	\$224,975		\$224,975	Estimated
641032	ASHLEYS STRETCHED LIMOUSINE SERVICE LLC	Bus	Limousine	\$22,693		\$40,707	Reported	\$12,485		\$12,485	Reported	\$3,050		\$3,050	Reported
641036	AVALON LIMOUSINE, LLC	Bus	Limousine	\$146,274		\$165,284	Reported	\$420,136		\$420,136	Reported	\$164,627		\$164,627	Reported
641037	YANKEE LIMOUSINE, INC.	Bus	Limousine	\$0		\$18,360	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a
641045	MARK A COOPER	Bus	Limousine	\$17,644		\$36,688	Reported	\$10,635		\$10,635	Reported	\$22,974		\$22,974	Reported
641051	BIG LEAGUE LIMOUSINE, INC.	Bus	Limousine	\$1		\$19,021	Estimated	\$1		\$1	Estimated	\$1		\$1	Estimated
641056	CARLISLE CAR & DRIVER SVC INC	Bus	Limousine	\$30,627		\$47,642	Reported	\$30,867		\$30,867	Reported	\$30,742		\$30,742	Reported
641060	AMERICAN LUXURY LIMOUSINE, INC.	Bus	Limousine	\$248,822		\$267,964	Reported	\$208,732		\$208,732	Reported	\$473,808		\$473,808	Reported
641064	ARISTA LIMOUSINE, INC.	Bus	Limousine	\$47,420		\$66,345	Reported	\$43,158		\$43,158	Reported	\$39,812		\$39,812	Reported
641073	ELITE CARRIAGES, INC.	Bus	Limousine	\$27,699		\$43,603	Reported	\$20,489		\$20,489	Reported	\$9,878		\$9,878	Reported
641089	AC-COACH OPERATIONS, INC.	Bus	Limousine	\$44,454		\$60,573	Reported	\$45,009		\$45,009	Reported	\$46,418		\$46,418	Reported
641093	SEAN MCDONOUGH	Bus	Limousine	\$0		\$19,083	Reported	\$0		\$0	Reported	\$0		\$0	Reported
641101	NITFANY EXPRESS INC	Bus	Taxi	n/a	n/a	\$16,801	n/a	n/a	n/a	\$0	n/a	\$298,801		\$298,801	Reported
641105	BLACK TIE LIMOUSINE SERVICES IN	Bus	Limousine	\$9,000		\$17,003	Reported	\$5,300		\$5,300	Reported	\$5,300		\$5,300	Reported
641106	ALPHA OMEGA LIMOUSINE NETWORK	Bus	Limousine	\$0		\$95,757	Reported	\$0		\$0	Reported	\$0		\$0	Reported
641127	CITY LIGHTS, LLC	Bus	Limousine	\$97,414	\$146,123	\$243,537	Reported	\$135,535	\$0	\$135,535	Reported	\$48,665	\$0	\$48,665	Reported
641128	LIBERATI, PAUL	Bus	Limousine	\$121,146	\$217,376	\$353,727	Reported	\$167,519	\$243,913	\$411,432	Reported	\$240,757	\$222,650	\$463,407	Reported
641131	NU EXODUS, INC.	Bus	Limousine	\$88,000		\$103,205	Reported	\$94,000		\$94,000	Reported	\$88,000		\$88,000	Reported
641133	GARY J MARBELLA	Bus	Limousine	\$34,824		\$50,036	Estimated	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a
641136	TURNER, KIM	Bus	Limousine	\$27,578		\$42,698	Reported	\$29,312		\$29,312	Reported	\$25,421		\$25,421	Reported
641141	AUGUSTUS REED JR	Bus	Limousine	\$0		\$15,235	Reported	\$25,000		\$25,000	Reported	\$52,000		\$52,000	Reported
641162	HEATHER NOUMHEH	Bus	Limousine	\$174,499		\$192,608	Reported	\$174,499		\$174,499	Estimated	\$103,204		\$103,204	Reported
641165	AMERICAN EAGLE BUS & LIMO INC	Bus	Limousine	\$29,794		\$48,922	Reported	\$11,278		\$11,278	Reported	n/a	n/a	\$0	n/a
641171	DEBERARDINI, CAROL A.	Bus	Limousine	\$1		\$15,064	Estimated	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a
641175	JADCO ENTERPRISES, INC.	Bus	Limousine	\$399,799		\$418,739	Reported	\$546,017		\$546,017	Reported	\$526,744		\$526,744	Reported
641181	MID-ATLANTIC TRANSPORTATION SERVICES, INC	Bus	Taxi	n/a	n/a	\$19,380	n/a	\$441,135	\$172,153	\$613,288	Reported	\$1,093,297	\$345,252	\$1,438,549	Reported
641205	EUGENIA GOROSHOVSKY	Bus	Limousine	\$10,350		\$29,466	Reported	\$5,396		\$5,396	Reported	\$4,680		\$4,680	Reported
641206	A. DIAMOND LIMOUSINE LLC	Bus	Limousine	\$24,934		\$41,762	Reported	\$23,371		\$23,371	Reported	\$16,010		\$16,010	Reported
641207	GARY POLZOT	Bus	Limousine	\$26,200		\$41,227	Reported	\$30,891		\$30,891	Reported	\$29,500		\$29,500	Reported
641219	LOU LANE, INC.	Bus	Limousine	\$967,915	\$0	\$983,125	Reported	\$1,268,437	\$168,824	\$1,437,261	Reported	\$863,639	\$135,349	\$998,988	Reported
641247	FIVE STAR LIMOUSINE SERVICE INC	Bus	Limousine	\$39,000		\$47,003	Reported	\$31,000		\$31,000	Reported	\$27,400		\$27,400	Reported
641251	MONARCH LIMOUSINE SERVICES, INC	Bus	Limousine	\$32,741		\$50,942	Reported	\$30,326		\$30,326	Reported	\$29,010		\$29,010	Reported
641256	NAGI TRANSPORTATION, INC.	Bus	Limousine	n/a	n/a	\$19,066	n/a	\$20,000		\$20,000	Reported	\$0		\$0	Reported
641261	PETE'S GARAGE, LLC	Bus	Limousine	\$15,636	\$58,694	\$92,842	Reported	\$10,003	\$84,600	\$94,603	Reported	\$400	\$64,095	\$64,495	Reported
641262	CHOICE CAB COMPANY	Bus	Taxi	\$80,776		\$96,390	Reported	\$80,812		\$80,812	Reported	\$89,552		\$89,552	Reported
641300	BEST VALUE LIMOUSINE, INC.	Bus	Limousine	\$54,660		\$73,303	Reported	\$71,120		\$71,120	Reported	\$68,517		\$68,517	Reported
641308	G.G.&C BUS COMPANY, INC.	Bus	Taxi	\$26,924		\$42,225	Reported	\$84,139		\$84,139	Estimated	\$0	\$1,690,387	\$1,690,387	Reported
641313	HUGHES LIMOUSINE SERVICE, INC.	Bus	Limousine	\$215,429		\$234,133	Reported	\$209,210		\$209,210	Reported	\$0		\$0	Reported
641315	ACCURATE TRANSPORTATION LLC	Bus	Limousine	\$28,781		\$47,796	Estimated	\$28,781		\$28,781	Estimated	\$1		\$1	Estimated
641317	DAV-EL NEW JERSEY, INC.	Bus	Limousine	\$207,738		\$209,888	Estimated	\$207,738		\$207,738	Estimated	\$228,512		\$228,512	Estimated
641326	A & D LIMOUSINE SERVICE, INC.	Bus	Limousine	\$1		\$19,137	Estimated	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a
641335	FAB LIMOUSINES, INC.	Bus	Limousine	\$100,785		\$145,300	Reported	\$115,860		\$115,860	Reported	\$130,750		\$130,750	Reported
641338	RHODS LIMOUSINE SERVICE, INC.	Bus	Limousine	\$422,113		\$441,631	Reported	\$496,949		\$496,949	Reported	\$520,609		\$520,609	Reported
641342	AIRPORT ORBIT, INC.	Bus	Limousine	\$265,938		\$281,995	Reported	\$265,938		\$265,938	Estimated	\$292,532		\$292,532	Estimated
641361	MARCO TRALONGO	Bus	Limousine	\$414,760	\$103,680	\$533,676	Reported	\$103,680	\$103,680	Estimated	\$456,236		\$456,236	Estimated	
641376	CORPORATE SEDAN SERVICE, LLC	Bus	Limousine	\$278,844		\$294,046	Reported	\$278,775		\$278,775	Reported	\$256,950		\$256,950	Reported
641377	MARION, MARY-JO B.	Bus	Limousine	\$20,020		\$39,355	Reported	\$23,777		\$23,777	Reported	\$18,018		\$18,018	Reported
641380	PEGLEY, LAURIN	Bus	Limousine	\$51,801		\$51,801	Estimated	\$51,801		\$51,801	Estimated	n/a	n/a	\$0	n/a
641385	TRI COUNTY ACCESS CO., INC.	Bus	Taxi	\$118,918		\$134,568	Reported	\$127,266		\$127,266	Reported	\$132,788		\$132,788	Reported
641389	LEROY MICKENS III	Bus	Limousine	\$39,300		\$56,350	Reported	\$39,300		\$39,300	Estimated	\$43,230		\$43,230	Estimated
641392	MEDALLION TRANSPORTATION, LTD.	Bus	Limousine	\$346,900		\$366,326	Reported	\$210,757		\$210,757	Reported	\$224,824		\$224,824	Reported
641408	READING CHECKER CAB, INC.	Bus	Taxi	\$392,820		\$412,421	Reported	\$358,578		\$358,578	Reported	\$362,035		\$362,035	Reported
641421	ALL AMERICAN LIMO, INC.	Bus	Limousine	\$231,576		\$250,596	Estimated	\$376,983		\$376,983	Reported	\$0	\$77,051	\$77,051	Estimated
641426	NORTHEAST LUXURY SEDAN, INC.	Bus	Limousine	\$22,500		\$39,580	Reported	\$12,500		\$12,500	Reported	\$0		\$0	Reported
641429	STAR LIMOUSINE, LLC	Bus	Limousine	\$337,415		\$356,475	Reported	\$337,415		\$337,415	Estimated	\$348,383		\$348,383	Estimated
641434	MIRZA CORPORATION ONE, INC.	Bus	Limousine	\$63,842		\$83,248	Reported	\$63,842		\$63,842	Estimated	\$59,877		\$59,877	Reported
641436	LASTING IMPRESSIONS DEEJAY AND	Bus	Limousine	\$25,420		\$46,578	Reported	\$18,268		\$18,268	Reported	\$12,318		\$12,318	Reported
641446	LCCB, INC.	Bus	Limousine	\$38,256		\$57,157	Reported	\$47,377		\$47,377	Reported	\$30,495		\$30,495	Reported
641454	BARTON ENTERPRISES, LLC	Bus	Limousine	\$6,947		\$26,302	Reported	\$0		\$0	Reported	\$0		\$0	Reported
641462	T & S LIMOUSINES, INC.	Bus	Limousine	\$30,569		\$50,033	Estimated	\$30,569		\$30,569	Estimated	\$33,411		\$33,411	Reported
641465	STEEL CITY LIMO, LLC	Bus	Limousine	\$17,097		\$32,320	Reported</								

641609	AAAA YELLOW CAB LLC	Bus	Taxi	\$27,887	\$44,990	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
641614	FUSARO BROTHERS, INC.	Bus	Taxi	\$419,675	\$438,678	Reported	\$457,478		\$457,478	Reported	\$493,904		\$493,904	Reported	
641616	CITYCAR SERVICES OF NJ LLC	Bus	Limousine	\$469,371	\$478,009	Estimated	\$452,979		\$452,979	Reported	\$634,511		\$634,511	Reported	
641621	CLASSIC BRITISH LIMOUSINE SERVICE INC	Bus	Limousine	\$32,680	\$52,155	Reported	\$6,544		\$6,544	Reported	\$12,406		\$12,406	Reported	
641630	WAHEED HAIDRI & AMEER MALIK	Bus	Limousine	\$290,150	\$309,505	Reported	\$361,060		\$361,060	Reported	\$492,152		\$492,152	Reported	
641635	GEMSTAR LIMOUSINE, LLC	Bus	Limousine	\$98,486	\$113,713	Reported	\$63,917		\$63,917	Reported	\$63,192		\$63,192	Reported	
641646	TAYLOR,STEPHEN & SONBERGER,JAMES	Bus	Limousine	\$19,320	\$34,544	Reported	\$18,360		\$18,360	Reported	\$21,762		\$21,762	Reported	
641647	BROOKVILLE LIMOUSINE SVRCE, LLC	Bus	Limousine	\$9,295	\$25,120	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
641668	FLUEHR, RICHARD J.	Bus	Limousine	\$71,126	\$90,146	Reported	\$55,461		\$55,461	Reported	\$98,943		\$98,943	Reported	
641671	SECRETS LIMOUSINE SERVICE, LLC	Bus	Limousine	\$608,966	\$99,134	\$727,522	Reported	\$0	\$99,134	\$99,134	Estimated	\$669,863	\$109,047	\$778,910	Estimated
641676	PREMIER CHARLOT LIMOUSINE SERVICE LLC	Bus	Limousine	\$2,100	\$2,100	Reported	\$1,543		\$1,543	Reported	\$257,202		\$257,202	Reported	
641683	BALDWIN LIMOUSINES, INC.	Bus	Limousine	\$17,623	\$35,944	Reported	\$20,372		\$20,372	Reported	\$17,585		\$17,585	Reported	
641693	VALLEY LIMOUSINE SERVICE, LLC	Bus	Limousine	\$67,601	\$85,646	Estimated	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
641702	FORNET ENTERPRISES, INC.	Bus	Limousine	\$0	\$18,337	Reported	\$0		\$0	n/a	n/a	n/a	\$0	n/a	
641707	RACING LIMOS OF HARRISBURG, LLC	Bus	Limousine	\$4,095	\$21,426	Estimated	n/a	n/a	\$0	n/a	\$2,740		\$2,740	Reported	
641710	AIR STAR TRANSPORTATION & LIMOUSINE SERVICE	Bus	Limousine	\$5,065	\$21,111	Reported	\$6,455		\$6,455	Reported	\$8,242		\$8,242	Reported	
641727	DAVID MARKS AZAR	Bus	Limousine	\$6,535	\$25,545	Reported	\$6,535		\$6,535	Estimated	\$7,189		\$7,189	Estimated	
641733	V J LIMO SERVICE, INC.	Bus	Limousine	\$8,200	\$27,701	Reported	\$4,900		\$4,900	Estimated	\$2,750		\$2,750	Reported	
641748	INFINITY LIMOUSINE, INC.	Bus	Limousine	\$508,348	\$527,881	Reported	\$551,926		\$551,926	Reported	\$604,128		\$604,128	Reported	
641749	JOHN R PIERCE	Bus	Limousine	\$9,590	\$24,792	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
641754	903 RENTALS INC.	Bus	Limousine	\$49,037	\$67,266	Reported	\$55,395		\$55,395	Reported	\$44,752		\$44,752	Reported	
641759	AMERICAN LIMOUSINE, INC.	Bus	Limousine	\$1,485,408	\$1,492,838	Reported	\$1,566,479		\$1,566,479	Reported	\$1,806,707		\$1,806,707	Reported	
641761	GOLD SEED, INC.	Bus	Limousine	\$71,450	\$90,390	Reported	\$58,620		\$58,620	Reported	\$51,318		\$51,318	Reported	
641763	AFTON LIMOUSINE SERVICE, LLC	Bus	Limousine	\$176,119	\$195,186	Reported	\$213,799		\$213,799	Reported	\$220,945		\$220,945	Reported	
641764	ROBERT MICHAEL SEARS	Bus	Limousine	\$11,310	\$11,310	Reported	\$25,441		\$25,441	Reported	\$39,044		\$39,044	Reported	
641771	A1 LIMOUSINE SVC/UNIVERSAL INC	Bus	Limousine	\$61,639	\$81,045	Reported	n/a	n/a	\$0	n/a	\$67,987		\$67,987	Reported	
641783	EXECUTIVE CAR & LIMO, SERV. INC	Bus	Limousine	\$21,546	\$39,383	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
641784	CONCORDE LIMOUSINE, INC.	Bus	Limousine	\$1,593	\$9,321	Reported	\$1,789		\$1,789	Reported	\$1,985		\$1,985	Reported	
641788	LOCKHEART LIMOUSINE, INC	Bus	Limousine	\$366,998	\$38,488	\$420,487	Reported	\$295,148	\$75,879	\$371,027	Reported	\$200,436	\$86,137	\$286,573	Reported
641801	BRUCE SNYDER ENTERPRISES INC	Bus	Limousine	\$143,966	\$163,029	Reported	\$143,966		\$143,966	Estimated	\$158,363		\$158,363	Estimated	
641803	PLATINUM TOUGH TRANSPORTATION,	Bus	Limousine	\$6,734	\$25,874	Estimated	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
641825	RIVERFRONT LIMOUSINE SERVICE, LLC	Bus	Limousine	\$6,185	\$14,254	Reported	\$6,185		\$6,185	Estimated	\$5,825		\$5,825	Reported	
641846	BUCKS CAB CO LLC	Bus	Taxi	\$82,056	\$101,030	Reported	\$73,963		\$73,963	Estimated	\$227,357		\$227,357	Reported	
641849	LIMO TODAY, INC.	Bus	Limousine	n/a	n/a	\$18,052	n/a	n/a	\$0	n/a	\$173,600	\$260,400	\$434,000	Reported	
641882	EQUIRE, PETER	Bus	Taxi	\$1	\$17,111	Estimated	n/a	n/a	\$0	n/a	\$1		\$1	Estimated	
642485	FULLINGTON TRAILWAYS LLC	Bus	Limousine	\$224,249	\$241,079	Estimated	\$0		\$0	Reported	\$0		\$0	Estimated	
644410	MANN, HENRY S.	Bus	Limousine	\$14,565	\$33,685	Reported	\$11,459		\$11,459	Reported	\$8,064		\$8,064	Reported	
645285	THE PARRISH TRANSPORTATION CO.	Bus	Limousine	\$186,176	\$204,816	Reported	\$130,925		\$130,925	Reported	\$155,613		\$155,613	Reported	
647770	ASV, LTD.	Bus	Limousine	\$210,031	\$229,177	Reported	\$224,087		\$224,087	Reported	\$224,088		\$224,088	Reported	
649649	MICHAEL MIZUR	Bus	Limousine	\$6,125	\$24,177	Reported	\$6,519		\$6,519	Estimated	\$2,580		\$2,580	Reported	
649764	SHARON CONFER, RANDY CONFER, COREY CONFER	Bus	Limousine	\$19,461	\$36,262	Estimated	\$19,461		\$19,461	Estimated	\$1		\$1	Estimated	
649841	PREMIER LUXURY RENTALS INC	Bus	Limousine	\$32,717	\$81,614	\$133,737	Reported	\$0	\$81,614	\$81,614	Estimated	\$12,213	\$72,709	\$84,922	Reported
649937	Gerardo Jose Del Gaudio t/a Gerardo's Transportation	Taxi	Taxi	\$10,001	\$10,001	Estimated	n/a	n/a	\$0	n/a	\$1		\$1	Estimated	
649946	GIT ENTERPRISES INC T/A LIMOS R US	Bus	Limousine	\$29,919	\$48,345	Reported	\$15,854		\$15,854	Reported	\$17,439		\$17,439	Estimated	
649947	CROWN LIMOUSINE INC	Bus	Limousine	\$193,642	\$212,695	Reported	\$65,745		\$65,745	Reported	\$69,174		\$69,174	Reported	
700999	RICHARD C TRAVERS T/A DUBOIS TAXI SERVICE	Truck	Taxi	\$10,452	\$26,253	Reported	\$46,823		\$46,823	Reported	n/a	n/a	\$0	n/a	
702787	VALLEY TAXI, INC.	Truck	Taxi	\$139,315	\$158,125	Reported	\$146,457		\$146,457	Reported	\$152,543		\$152,543	Reported	
702931	TDF SERVICES, INC.	Truck	Limousine	\$142,433	\$157,572	Reported	\$147,302		\$147,302	Reported	\$134,788		\$134,788	Reported	
704391	MTR TRANSPORTATION INC	Truck	Taxi	\$40,235	\$58,090	Reported	\$51,361		\$51,361	Reported	\$56,497		\$56,497	Estimated	
705674	AAAA MOONLIGHT TAXICAB CO LLC	Truck	Taxi	\$134,051	\$151,064	Estimated	n/a	n/a	\$0	n/a	\$82,963		\$82,963	Estimated	
706158	EZ TAXI LLC	Truck	Taxi	\$63,062	\$80,165	Reported	\$79,036		\$79,036	Reported	\$85,272		\$85,272	Reported	
763990	HANDY DELIVERY, INC.	Truck	Limousine	\$506,731	\$523,334	Reported	\$547,667		\$547,667	Reported	\$1,133,576		\$1,133,576	Reported	
866650	HARRY WILLIAMS T/A EAGLE TAXI	Truck	Taxi	n/a	n/a	\$15,219	n/a	n/a	\$0	Reported	\$0		\$0	Reported	
6310022	RAY RAY CAB COMPANY LLC D/B/A PITTSBURGH CITY	Taxi	Taxi	\$84,981	\$100,204	Reported	\$131,046		\$131,046	Reported	\$201,423		\$201,423	Reported	
6310028	Warren Taxi Service, LLC	Taxi	Taxi	\$126,046	\$126,046	Reported	\$91,687		\$91,687	Reported	\$89,383		\$89,383	Reported	
6310311	ROSEMONT TAXICAB CO INC	Taxi	Taxi	\$560,000	\$568,003	Reported	\$380,000		\$380,000	Reported	\$418,000		\$418,000	Estimated	
6310376	GOLDEN TAXI LLC	Taxi	Taxi	\$59,000	\$59,000	Reported	\$45,300		\$45,300	Reported	\$49,830		\$49,830	Estimated	
6310463	PIKE COUNTY TAXI INC	Taxi	Taxi	\$92,381	\$110,709	Reported	\$68,545		\$68,545	Reported	\$41,000		\$41,000	Estimated	
6310493	J B TAXI LLC	Taxi	Taxi	n/a	n/a	\$15,003	n/a	n/a	\$339,227	\$339,227	Reported	\$373,150		\$373,150	Reported
6310920	METRO TRANSPORTATION OF PENNSYLVANIA,LLC/T	Taxi	Taxi	\$73,251	\$88,756	Reported	\$69,985		\$69,985	Reported	\$73,159		\$73,159	Reported	
6311233	ALBERT ALISSON AUSTIN LLC T/A HAPPY VALLEY RIDG	Taxi	Taxi	\$82,621	\$99,491	Reported	\$89,260		\$89,260	Reported	\$100,846		\$100,846	Reported	
6311269	BOAZ CAB CORP	Taxi	Taxi	\$1,000	\$20,140	Reported	\$1,000		\$1,000	Estimated	\$0		\$0	Reported	
6311317	QUAKERTOWN TAXI LLC	Taxi	Taxi	\$84,671	\$103,622	Reported	\$129,326		\$129,326	Reported	\$135,746		\$135,746	Reported	
6311389	Joseph A. Mousse t/a YELLOW CAB OF EASTON and T	Taxi	Taxi	\$218,282	\$236,324	Reported	\$274,399		\$274,399	Reported	\$343,427		\$343,427	Reported	
6311390	STYLE BY THE MILE INC	Taxi	Taxi	\$11,467	\$30,111	Estimated	n/a	n/a	\$0	n/a	\$1		\$1	Estimated	
6311476	D M L CAB CO	Taxi	Taxi	n/a	n/a	\$19,145	n/a	n/a	\$0	n/a	\$1		\$1	Estimated	
631478	GOLF TAXI INC	Taxi	Taxi	\$1	\$18,975	Estimated	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
631480	T & W CAB CO	Taxi	Taxi	\$0	\$19,064	Reported	\$0		\$0	Estimated	\$0		\$0	Estimated	
631483	LEONID TAXI INC	Taxi	Taxi	\$580	\$19,704	Reported	\$580		\$580	Estimated	\$638		\$638	Estimated	
631484	LITTLE AL CAB INC	Taxi	Taxi	\$0	\$19,150	Reported	\$0		\$0	Estimated	\$0		\$0	Estimated	
631486	M D CAB CO	Taxi	Taxi	n/a	n/a	\$19,115	n/a	n/a	\$0	n/a	\$0		\$0	Reported	
631745	TAXI EXPRESS LLC	Taxi	Taxi	\$70,304	\$87,705	Reported	\$70,304		\$70,304	Estimated	\$0		\$0	Reported	
6313026	TINICUM TAXI LLC	Taxi	Taxi	n/a	n/a	\$19,029	n/a	n/a	\$197	Reported	\$24,331		\$24,331	Reported	
6313515	TJS ENTERPRISES, LLC	Taxi	Taxi	n/a	n/a	\$16,354	n/a	\$4,946	\$4,946	Reported	\$4,834		\$4,834	Reported	
6314785	ETSEL L MAIDENS JR & JODI L MAIDENS	Taxi	Taxi	n/a	n/a	\$16,652	n/a	n/a	n/a	n/a	\$21,829		\$21,829	Reported	
6315202	LANCASTER CITY CABS LLC	Taxi	Taxi	n/a	n/a	\$17,603	n/a	n/a	n/a	n/a	\$27,489		\$27,489	Reported	
6315203	DETTERLINE ENTERPRISES LLC	Taxi	Taxi	n/a	n/a	\$17,356	n/a	n/a	n/a	n/a	\$277,726		\$277,726	Reported	
6315888	CANYON COUNTRY CABS LLC	Taxi	Taxi	n/a	n/a	\$16,901	n/a	n/a	n/a	n/a	\$692		\$692	Reported	
6410077	ENTERPRISE LIMOUSINE INC	Bus	Limousine	\$253,285	\$272,239	Reported	\$83,320		\$83,320	Reported	\$75,164		\$75,164	Reported	
6410078	EXPRESS LIMO INC	Bus	Limousine	\$44,262	\$63,416	Reported	\$45,262		\$45,262	Reported	\$49,788		\$49,788	Estimated	
6410146	ALL AROUND TRANSPORTATION SERVICES LLC	Bus	Limousine	\$9,264	\$24,882	Estimated	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
6410195	HI LINE LIMOUSINE SERVICE INC	Bus	Limousine	\$0	\$19,115	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
6410308	SUPERIOR VIP LIMOUSINE LLC	Bus	Limousine	\$23,149	\$40,751	Reported	\$30,966		\$30,966	Reported	\$25,685		\$25,685	Reported	
6410333	FOUR SEASONS LIMOUSINE SERVICE INC	Bus	Limousine	\$0	\$0	Reported	\$0		\$0	Estimated	\$123,940		\$123,940	Reported	
6410340	M & M LIMOUSINE SERVICE INC	Bus	Limousine	\$4,953	\$20,454	Reported	\$800		\$800	Reported	\$2,675		\$2,675	Reported	
6410372	ADMIRE LIMOUSINE INC	Bus	Limousine	\$158,132	\$177,138	Reported	n/a	n/a	\$0	n/a	\$219,641		\$219,641	Reported	
6410441	TRAVEL TIME TRAVEL AGENCY INC	Bus	Limousine	\$16,633	\$34,234	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
6410449	HAINES TRANSPORTATION SERVICES INC T/D/B/A M	Bus	Limousine	\$459,526	\$479,059	Reported	\$595,228		\$595,228	Reported	\$581,916		\$581,916	Reported	
6410504	ALTOONA VIP LIMOUSINE AND CAR SERVICE LLC	Bus	Limousine	\$35,900	\$51,501	Reported	\$39,041		\$39,041	Reported	\$29,710		\$29,710	Reported	
6410505	TEMGIZ KALANDAZE	Bus	Limousine	\$17,138	\$36,144	Reported	\$17,138		\$17,138	Estimated	\$18,852		\$18,852	Estimated	
6410529	AUTO EFFECTS MOTOR SPORTS INC	Bus	Limousine	\$24,998	\$40,059	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a	
6410537	FEEL GOOD LIMO INC	Bus	Limousine	\$116,379	\$135,091	Reported	\$83,964		\$83,964	Reported	\$61,335		\$61,335	Reported	
6410565	YOUTH TRANSIT AUTHORITY LLC	Bus	Limousine	\$848,213	\$865,270	Reported	\$1,326,054		\$1,326,054	Reported	\$1,413,048		\$1,413,048	Report	

6411430	HYBRID PLANET CHAUFFEUR SERVICE LLC	Bus	Limousine	\$431,907	\$450,990	Reported	\$627,429		\$627,429	Reported	\$642,412		\$642,412	Reported
6411464	BALDEV KAPOOR & FELIX RIVERA, CO-PARTNERS T/A	Bus	Limousine	\$0	\$17,257	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a
6411522	SCOTT R RICE	Bus	Limousine	\$96,962	\$112,190	Reported	\$146,279		\$146,279	Reported	\$119,990		\$119,990	Reported
6411528	AAA WORLDWIDE TRANSPORTATION INC	Bus	Limousine	\$149,517	\$158,326	Reported	\$124,558		\$124,558	Reported	\$129,068		\$129,068	Reported
6411639	24-7 LIMO INC	Bus	Limousine	\$3,056	\$18,373	Reported	n/a	n/a	\$0	n/a	n/a	n/a	\$0	n/a
6411671	SUPREME TRANSPORTATION INC	Bus	Limousine	\$39,275	\$58,676	Reported	\$39,275		\$39,275	Estimated	\$43,203		\$43,203	Estimated
6411716	CORPORATE CARS OF LEHIGH VALLEY LLC	Bus	Limousine	\$25,012	\$42,913	Reported	\$30,607		\$30,607	Reported	\$29,196		\$29,196	Reported
6411789	BELLA TRANSPORTATION LLC	Bus	Limousine	\$4,862	\$22,967	Reported	\$15,621		\$15,621	Reported	\$34,288		\$34,288	Reported
6411823	UNIVERSAL CORPORATE ENTERPRISES LLC	Bus	Limousine	\$2,952	\$11,046	Reported	\$6,601		\$6,601	Reported	\$5,795		\$5,795	Reported
6411829	ADVENTURE LIMOUSINE LLC	Bus	Limousine	\$6,189	\$23,267	Reported	\$4,800		\$4,800	Reported	n/a	n/a	\$0	n/a
6411944	Curry Limousine, LLC	Bus	Limousine	\$42,953	\$59,997	Reported	\$49,858		\$49,858	Reported	\$66,975		\$66,975	Reported
6412042	BIG CITY LIMOUSINE SERVICE LLC	Bus	Limousine	\$0	\$0	Reported	\$0		\$0	Reported	\$0		\$0	Reported
6412086	AABSOLUTE CAR AND LIMOUSINE SERVICE, LLC T/A A	Bus	Limousine	\$725	\$20,060	Reported	\$725		\$725	Estimated	\$0		\$0	Reported
6412097	KOOT LIMO CAR LLC	Bus	Limousine	\$15,776	\$35,111	Reported	\$313		\$313	Reported	\$64,271		\$64,271	Reported
6412147	ACE TRANSIT MANAGEMENT LLC	Bus	Limousine	\$109,885	\$129,000	Reported	\$107,773		\$107,773	Reported	\$129,710		\$129,710	Reported
6412246	EAGLE CHAUFFEURED SERVICES INC	Bus	Limousine	\$747,605	\$766,947	Reported	\$545,430		\$545,430	Reported	\$599,973		\$599,973	Estimated
6412324	CONTINENTAL LIMOUSINE SERVICE LLC	Bus	Limousine	\$2,677	\$22,057	Reported	\$0		\$0	Reported	\$16,127		\$16,127	Reported
6412474	T M MCDEARMOTT & CO INC	Bus	Limousine	\$24,672	\$44,052	Reported	\$27,731		\$27,731	Reported	\$34,947		\$34,947	Reported
6412480	MARK A GOLDING	Bus	Limousine	\$1,100	\$19,563	Reported	\$550		\$550	Reported	n/a	n/a	\$0	n/a
6412524	MG TRANSPORT INC	Bus	Limousine	n/a	n/a	\$19,153	n/a	\$101,790	\$89,200	\$190,990	Reported	\$98,120	\$98,120	Reported
6412672	ANGEL CAJIK T/A A N S LIMO AND CAR SERVICE	Bus	Limousine	\$149,957	\$168,977	Reported	\$141,547		\$141,547	Reported	n/a	n/a	\$0	n/a
6412840	MSG ENTERPRISES, LLC T/A GEOMARK LUXURY LIMOUSINE	Bus	Limousine	\$82,088	\$100,140	Reported	\$52,181		\$52,181	Reported	\$53,693		\$53,693	Reported
6412854	STAR EXPRESS TRANSPORT LLC T/D/B/A STAR EXPRESS	Bus	Limousine	\$7,800	\$24,906	Reported	\$37,602		\$37,602	Reported	\$51,597		\$51,597	Reported
6412944	MILLENNIUM LIMOUSINE GROUP INC	Bus	Limousine	\$143,017	\$162,372	Reported	\$162,513		\$162,513	Reported	\$178,764		\$178,764	Estimated
6413013	TROPICAL TANNING AND BEAUTY SALON INC	Bus	Limousine	\$40,624	\$58,369	Reported	\$55,927		\$55,927	Reported	\$88,542		\$88,542	Reported
6413110	INFINITY TRANSPORTATION SERVICES LLC	Bus	Limousine	\$10,649	\$28,252	Reported	\$30,687		\$30,687	Reported	\$41,805		\$41,805	Reported
6413244	ALLEGHENY COACH INC	Bus	Limousine	\$72,850	\$88,077	Reported	\$82,495		\$82,495	Reported	\$68,877		\$68,877	Reported
6413426	DAVID R ZEMBRZUSKI	Bus	Limousine	\$0	\$15,065	Reported	\$0		\$0	Reported	\$0		\$0	Reported
6413528	DONALD EDWARD ROBERTSON T/A ROBERTSON TOURS	Bus	Limousine	\$1,500	\$20,518	Reported	\$18,000		\$18,000	Reported	\$26,000		\$26,000	Reported
6413591	BALDEV KAPOOR	Bus	Limousine	\$5,350	\$38,180	Reported	\$5,350		\$5,350	Estimated	n/a	n/a	\$0	n/a
6413645	RELIANT TRANSPORTATION SERVICE INC	Bus	Limousine	n/a	\$15,229	n/a	\$10,963		\$10,963	Reported	\$38,477		\$38,477	Reported
6413689	SOUTH SHORE LIMOUSINE LLC	Bus	Limousine	n/a	\$16,505	n/a	\$18,913		\$18,913	Reported	\$53,995		\$53,995	Reported
6413753	COUNTY LIMO LLC	Bus	Limousine	n/a	\$19,032	n/a	\$7,651		\$7,651	Reported	\$59,762		\$59,762	Reported
6413770	C.R. WILKERSON LLC	Bus	Limousine	n/a	\$17,112	n/a	\$0		\$0	Reported	\$0		\$0	Estimated
6413814	WORLD CLASS RIDE LLC T/A WORLD CLASS RIDE	Bus	Limousine	n/a	\$19,096	n/a	\$0		\$0	Reported	n/a	n/a	\$0	n/a
6413911	HOLLOW SANDS LLC	Bus	Limousine	n/a	\$19,153	n/a	n/a		\$0	n/a	\$45,600		\$45,600	Reported
6414083	MANUALS BASIC BUSINESS SYSTEMS LLC	Bus	Limousine	n/a	\$19,426	n/a	\$11,175		\$11,175	Reported	\$12,293		\$12,293	Estimated
6414147	THREE KINGS TRANSPORTATION LLC	Bus	Limousine	n/a	\$18,902	n/a	\$0	\$56,171	\$56,171	Reported	\$61,452	\$0	\$61,452	Reported
6414192	MAGILL ENTERPRISES LLC	Bus	Limousine	n/a	\$19,012	n/a	\$12,006		\$12,006	Reported	\$13,207		\$13,207	Estimated
6414271	LAKE REGION FITNESS LLC	Bus	Limousine	n/a	\$34,134	n/a	\$9,108		\$9,108	Reported	n/a	n/a	\$0	n/a
6414292	ASCOT TRANSPORTATION GROUP LLC	Bus	Limousine	n/a	\$18,966	n/a	n/a		\$0	n/a	\$16,984		\$16,984	Reported
6414558	BRIAN ALBERT CLARK	Bus	Limousine	n/a	\$15,136	n/a	\$0		\$0	Reported	n/a	n/a	\$0	n/a
6414580	VALLEY LIMOUSINE AND CHARTER LLC	Bus	Limousine	n/a	\$15,650	n/a	\$11,390	\$12,187	\$23,577	Reported	\$27,683	\$14,590	\$42,273	Reported
6414731	APEX LIMOUSINE INC	Bus	Limousine	n/a	\$19,007	n/a	\$0		\$0	Reported	\$69,362		\$69,362	Reported
6415052	5 STAR LIMO LLC	Bus	Limousine	n/a	\$19,335	n/a	n/a		\$0	n/a	\$10,232		\$10,232	Reported
6415054	PEAT'S ELITE CAR SERVICE INC	Bus	Limousine	n/a	\$19,446	n/a	n/a		\$0	n/a	\$12,300		\$12,300	Reported
6415073	GENERAL LIMOUSINE LLC	Bus	Limousine	n/a	\$19,053	n/a	n/a		\$0	n/a	\$43,097		\$43,097	Reported
6415103	LB LIMOUSINE SERVICE LLC	Bus	Limousine	n/a	\$18,101	n/a	n/a		\$0	n/a	\$8,384		\$8,384	Reported
6415141	SIGNATURE SEDAN SERVICE INC	Bus	Limousine	n/a	\$19,116	n/a	n/a		\$0	n/a	\$45,780		\$45,780	Reported
6415146	BRIGITTES DIGITS LLC	Bus	Limousine	n/a	\$15,237	n/a	n/a		\$0	n/a	\$28,892		\$28,892	Reported
6415166	ATLAS TRANSPORTATION INC	Bus	Taxi	n/a	\$19,355	n/a	n/a		\$0	n/a	\$150,000		\$150,000	Reported
6415166	ATLAS TRANSPORTATION INC	Bus	Limousine	n/a	\$19,355	n/a	n/a		\$0	n/a	\$150,000		\$150,000	Reported
6415258	KEN ROBINSON LIMOUSINE SERVICE LLC	Bus	Limousine	n/a	\$19,406	n/a	n/a		\$0	n/a	\$10,820		\$10,820	Reported
6415297	ANTHONY F WILLIAMS	Bus	Limousine	n/a	\$15,219	n/a	n/a		\$0	n/a	\$98,424		\$98,424	Reported
6415306	FRANCIS C WILLIAMS	Bus	Limousine	n/a	\$15,219	n/a	n/a		\$0	n/a	\$1,326		\$1,326	Reported
6415315	EXTREME HEALTH CARE SERVICES LLC	Bus	Limousine	n/a	\$17,104	n/a	n/a		\$0	n/a	\$0		\$0	Reported
6415353	ALPHA LIMOUSINE SERVICES INC	Bus	Limousine	n/a	\$19,082	n/a	n/a		\$0	n/a	\$0		\$0	Reported
6415471	ACE LIMOUSINE AND AIRPORT SERVICE LLC	Bus	Limousine	n/a	\$19,013	n/a	n/a		\$0	n/a	\$235,000		\$235,000	Reported
6415493	ARMANIS LIMOUSINE SERVICE LLC	Bus	Limousine	n/a	\$18,229	n/a	n/a		\$0	n/a	\$0		\$0	Reported
6415494	VITAL EXPRESS LIMO INC	Bus	Taxi	n/a	\$19,082	n/a	n/a		\$0	n/a	\$4,869		\$4,869	Reported
6415641	THANK YOU LIMOUSINE INC	Bus	Limousine	n/a	\$19,422	n/a	n/a		\$0	n/a	\$4,000		\$4,000	Reported
6415653	DIRECT LIMO & CAR SERVICE INC	Bus	Limousine	n/a	\$19,464	n/a	n/a		\$0	n/a	\$0		\$0	Reported

RECEIVED  
IRRC

2015 FEB 27 AM 10:32

**FACE SHEET  
FOR FILING DOCUMENTS  
WITH THE LEGISLATIVE REFERENCE BUREAU**

**(Pursuant to Commonwealth Documents Law)**

DO NOT WRITE IN THIS SPACE

Copy below is hereby approved as to form and legality. Attorney General.

BY \_\_\_\_\_  
(DEPUTY ATTORNEY GENERAL)

DATE OF APPROVAL \_\_\_\_\_

Check if applicable  
Copy not approved. Objections attached

Copy below is hereby certified to be true and correct copy of a document issued, prescribed or promulgated by:

Pennsylvania Public Utility Commission  
(AGENCY)

DOCUMENT/FISCAL NOTE NO. L-2013-2349042/57-296

DATE OF ADOPTION November 13, 2014

BY *Rosemary Chiavetta*  
Rosemary Chiavetta

TITLE *Secy*  
(SECRETARY)

Copy below is hereby approved as to form and legality. Executive or independent Agencies.

*Bohdan R. Pankiw*  
Bohdan R. Pankiw  
Chief Counsel

*11-13-2014*  
DATE OF APPROVAL

Check if applicable. No Attorney General approval or objection within 30 days after submission.

L-2013-2349042/57-296  
Final Rulemaking  
Motor Carrier Vehicle List and  
Vehicle Age Requirements  
52 Pa Code, Chapter 29

The Pennsylvania Public Utility Commission on November 13, 2014, adopted a final rulemaking order amending its current motor carrier passenger regulations to eliminate the vehicle list requirements for taxis and limousines, eliminate the waiver exception for vehicle age limitation for taxis and replace the vehicle age limitation for limousines with a vehicle mileage requirement. The contact person is Assistant Counsel Ken Stark, Law Bureau, 717 787-5558.

**EXECUTIVE SUMMARY**  
L-2013-2349042/57-296

Final Rulemaking Re Vehicle List, Age, and Mileage Requirements for Taxis and Limousines

52 Pa. Code § 29.314(c)-(d) and 52 Pa. Code § 29.333(d)-(e)

Section 1501 of the Public Utility Code requires every public utility in Pennsylvania to “maintain adequate, efficient, safe, and reasonable service and facilities” and to “make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public.” 66 Pa. C.S. § 1501. Pursuant to that authority and Section 501 of the Public Utility Code, the Pennsylvania Public Utility Commission (Commission) is amending its motor carrier passenger regulations to ensure the availability of safe and reliable taxi and limousine fleets for the public.

On April 4, 2013, the Commission sought public comment on proposed revisions to its motor carrier regulations in Sections 29.314 and 29.333 in Title 52 of the Pennsylvania Code. The Commission analyzed the public comments, reevaluated its proposed regulations, and entered a Final Rulemaking Order on November 19, 2014, wherein the Commission eliminated the vehicle list requirement for taxis and limousines, as the vehicle list did not effectively aid the Commission in enforcement efforts. The Commission also eliminated the vehicle waiver program for both taxis and limousines, finding that the waiver exception no longer served the public interest, as limited Commission resources could be more effectively and efficiently utilized in other areas of motor carrier enforcement. As a result of eliminating the vehicle waiver program, the Commission replaced the 8-year vehicle age limitation for taxis with either a 10-year age limitation or a 350,000 mileage limitation, whichever comes first. The Commission also replaced the 8-year vehicle age limitation for limousines with a vehicle mileage limitation of 350,000 miles. The final regulations also incentivize the use of alternative fuel vehicles (AFVs) by allowing AFVs to operate in taxi service until reaching the age of 12 model years.

PUC contacts for this final rulemaking are Ken Stark, 717-787-5558 (legal) and Rob Bingaman, 717-787-1168 (technical).

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

Public Meeting held November 13, 2014

Commissioners Present:

Robert F. Powelson, Chairman  
John F. Coleman, Jr., Vice Chairman  
James H. Cawley  
Pamela A. Witmer  
Gladys M. Brown

Vehicle List, Age, and Mileage  
Requirements For Taxis and Limousines,  
52 Pa. Code §§ 29.314(c)-(d), 29.333(d)-(e)

Docket No. L-2013-2349042

**FINAL RULEMAKING ORDER**

**BY THE COMMISSION:**

On April 4, 2013, the Pennsylvania Public Utility Commission (Commission) adopted a Proposed Rulemaking Order seeking to amend our current motor carrier passenger regulations 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 200,000 vehicle mileage limitation. *See* 52 Pa. Code §§ 29.314(c)-(d), 29.333(d)-(e). The Commission proposed these regulations to protect the public interest and to more efficiently and effectively use Commission resources in the regulation of taxis and limousines. Pursuant to the Commonwealth Documents Law, we requested public comment on our proposed regulations. *See* 45 P.S. § 1201(5). Upon review and consideration of those comments, we issue final-form regulations, as set forth in Annex A of this Order.

## **BACKGROUND**

In late 2012 and early 2013, the Commission determined that public interest and public safety concerns warranted revising our current regulations and procedures for vehicle list and vehicle age requirements for taxis and limousines under our jurisdiction. Accordingly, on April 4, 2013, we adopted a Proposed Rulemaking Order proposing 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 200,000 vehicle mileage limitation. *See* 52 Pa. Code §§ 29.314(c)-(d), 29.333(d)-(e). Docket No. L-2013-2349042 (Order entered Apr. 5, 2013).

As required by the Regulatory Review Act, the Proposed Rulemaking Order, Executive Summary thereof, and Regulatory Analysis Form were submitted to the Office of Attorney General and the Office of Budget on June 6, 2013, receiving approval by the Attorney General on June 25, 2013. *See* 71 P.S. § 745. The Proposed Rulemaking Order, Executive Summary, and Regulatory Analysis Form were submitted on October 3, 2013 to the Independent Regulatory Review Commission (IRRC), the Legislative Reference Bureau, and the legislative committees. *See* 71 P.S. § 745.5a; 1 Pa. Code § 305.1. The Legislative Reference Bureau published the Proposed Rulemaking Order on October 19, 2013 in the *Pennsylvania Bulletin*, providing for a 30-day public comment period. 43 Pa.B. 6203.

### **Comments**

Comments were filed by thirty-two interested parties, including industry representatives and stakeholders, IRRC, and members of the State House of Representatives. As required by the Commonwealth Documents Law, we have reviewed the comments, which we will summarize and discuss, as necessary and applicable, to explain the determination of our final-form regulations. *See* 45 P.S. § 1202.

### IRRC's Comments

In its Comments filed on December 13, 2013, IRRC seeks more information from the Commission regarding the potential financial impact of the proposed regulations on small businesses and carriers. IRRC also seeks more information on costs and/or savings to the regulated community and to the Commission, specifically the expenditure history of the waiver program for the past three years. Comments at 1-2. IRRC is concerned that eliminating the waiver program for taxis older than eight model years will have “severe consequences for small carriers.” *Id.* at 3. IRRC expressed concern that allowing a carrier to file a petition for waiver pursuant to 52 Pa. Code § 5.43 would not eliminate the administrative burden, but simply transfer and potentially increase the burden on the Commission and carriers. *Id.* IRRC asked the PUC to consider delaying the effective date of the regulation to ensure carriers have time to comply with the regulation and avoid experiencing financial hardship. *Id.*

As to limousines, IRRC encourages the PUC to reevaluate the proposed 200,000 mileage limitation in Section 29.333 to determine the appropriate limit that balances the public interest with the adverse fiscal impact on the regulated community. *Id.* at 3-4.

### Comments from State Representatives

In a letter dated April 18, 2013, State Representative Tim Krieger expressed general support for the proposed regulations for limousine service. In a letter dated December 5, 2013, State Representatives Kerry Benninghoff and C. Adam Harris also supported the Commission's proposal to utilize a mileage standard over an age standard for limousines.

In a letter dated October 31, 2013, State Representative Thomas Murt endorsed the comments of Willow Grove Yellow Cab t/d/b/a Bux-Mont, which are provided directly below. Mr. Murt recommended staggering vehicle inspections, simplifying the waiver process, and utilizing a mileage standard over an age standard.



Willow Grove Yellow Cab t/d/b/a Bux-Mont

Willow Grove Yellow Cab t/d/b/a Bux-Mont (Bux-Mont), which possesses both call and demand and limousine authority, expressed concern that elimination of the waiver process will result in financial hardship in an already difficult economic climate. Comments at 1, 3. Rather than abolish the waiver process, Bux-Mont provided solutions to ease the Commission's administrative burden, first suggesting that the Commission stagger dates by which taxicab carriers must file waiver requests. *Id.* at 1-2. Bux-Mont recommended that the Commission combine inspections associated with waiver petitions with other existing enforcement activity, noting repeated visits by Commission staff to Bux-Mont's facility over a short time period. *Id.* at 2. Bux-Mont suggests that the waiver process could be improved if the Commission implemented clearer instructions and more specific criteria as to what the Commission expects in a waiver petition. *Id.*

Bux-Mont limited its comments to taxi service in Section 29.314, but contends that the mileage standard proposed for limousines in Section 29.333 is more reasonable than the age standard and should also be applied to vehicles used as taxis. *Id.* at 3. An absolute age limit would prevent the use of older, safe vehicles with lower mileage used primarily in suburban and rural areas. *Id.*

The Greater Pennsylvania Taxicab Association

The comments of the Greater Pennsylvania Taxicab Association (GPTA), which represents 28 taxicab companies providing call and demand service, only addressed proposed changes to call and demand (taxi) service in Section 29.314 of Title 52 of the Pennsylvania Code.

Instead of supporting the Commission's proposed elimination of the vehicle list requirement, Section 29.314, GPTA proposed new language that would require limited reporting of only those vehicles which will exceed the eight year age limitation during the next twelve months. Specifically, GPTA proposed:

(d) *Vehicle list.* [Between December 1 and December 31] During the first quarter of each calendar year, carriers shall provide the Commission with a current list of all vehicles utilized under its call or demand authority which will exceed 8 model years old during the succeeding twelve months. The list must contain the year, make, vehicle identification number, current odometer reading and registration number for each vehicle.

Comments at 4. In supporting the above language, GPTA asserted that requiring an annual list only for those vehicles that are about to “age out” will allow PUC Enforcement Officers to better schedule and perform vehicle inspections throughout the upcoming year, thereby resulting in greater efficiencies and cost savings. *Id.* at 3-4. Requiring the list at the beginning of the calendar year would also avoid any end of the year rush to inspect multiple vehicles. *Id.* at 4. Instead of entirely eliminating the Commission’s current vehicle age waiver provision and program, GPTA would like “wheels off” inspections conducted for taxis that a carrier has maintained well, but will soon surpass the Commission’s eight year age limitation.

Accordingly, GPTA opposes the elimination of Section 29.314(d)’s language “unless otherwise permitted by the Commission,” which led to the Commission’s waiver program for vehicles older than eight model years, but determined safe after an inspection. *Id.* at 5, 8. In stressing that age is not necessarily a true indicator of a particular vehicle’s safety, GPTA asserted that age should not be the sole criterion for elimination of a particular vehicle in a taxicab fleet. Comments at 3, 6. GPTA contends that an absolute eight year age limitation with no waiver exception would result in financial hardship to certain taxicab carriers, observing that rural taxicabs are not in constant use and transport individuals over greater distances than vehicles used in metropolitan areas. *Id.* at 6, 15. GPTA also observed that an absolute eight year age rule prevents companies from using safe, antique vehicles and older vehicles with limited

mileage.<sup>1</sup> *Id.* at 7. An absolute eight year limitation would require faster vehicle turnover and especially impact smaller carriers with less revenue, cash flow, and financial flexibility. *See id.* at 12-14 (explaining that the 8 year age rule has resulted in the use of vehicles that are under 8 years but have more than 400,000 cumulative miles).

So that age is not used as the sole criterion to determine whether a particular vehicle is safe, GPTA proposed the following language change to Section 29.314(d) to allow for a special “wheels off” inspection for vehicles older than eight model years:

(d) *Vehicle age.* Unless otherwise permitted by the Commission, a vehicle may not be operated in call and demand service which is more than 8 model years old unless the vehicle is submitted for and passes a special wheels off inspection in the presence of a Commission Enforcement Officer. This inspection shall be in addition to any routine inspection pursuant to the Motor Vehicle Code or 52 Pa. Code § 29.406.

Comments at 8, 20. Alternatively, GPTA proposed an absolute 10 year vehicle age limitation. *Id.* at 16-17.

#### Central Pennsylvania Taxicab Association

The Central Pennsylvania Taxicab Association submitted comments comprised of a single statement expressing strong support for GPTA’s above comments.

#### Philadelphia Regional Limousine Association and Lehigh Valley Transportation Service

The Philadelphia Regional Limousine Association and the Lehigh Valley Transportation Service (collectively “the Limousine Association”) filed joint comments, pertaining only to the proposed changes to Section 29.333 regarding limousine service. The Limousine Association supports the elimination of the vehicle list requirement for an entire fleet, but suggests that a carrier be required to provide a list of any vehicle that

---

<sup>1</sup> In the Proposed Rulemaking Order, the Commission noted that carriers could still apply for waiver of Commission regulations for vehicles, like antiques, that are older but still safe. GPTA contends that this will result in substitution of one regulation for another and therefore not save administrative costs and resources. *See* Comments at 9-12.

would either “age or mileage out” during the first quarter of the calendar year.

Comments at 3-4. Specifically, the Limousine Association proposed retaining Section 29.333(d) with the following language modifications:

(d) *Vehicle list.* [Between December 1 and December 31] During the first quarter of each calendar year, carriers shall provide the Commission with a current list of all vehicles utilized under its limousine authority which it anticipates will exceed an odometer reading of 500,000 miles during the succeeding twelve months. The list must contain the year, make, vehicle identification number, current odometer reading and registration number for each vehicle....

Comments at 15. In the same vein as the comments of GPTA regarding modifications to taxi service, the Limousine Association asserted that the above proposed changes would allow the PUC’s Enforcement Division to better manage and schedule special “wheels off” inspections throughout the course of the year. Instead of entirely eliminating the Commission’s vehicle waiver provision, the Limousine Association would like “wheels off” inspections conducted for limousines that a carrier has maintained well, but will soon surpass the Commission’s mileage limitation.

Accordingly, the Limousine Association opposes the elimination of Section 29.333(e)’s language “unless otherwise permitted by the Commission,” which led to the Commission’s waiver program for vehicles older than eight model years, but determined safe after an inspection. Specifically, the Limousine Association proposes the following language modifications to Section 29.333(e):

(e) *Vehicle [age] mileage.* Unless otherwise permitted by the Commission, a vehicle with more than 500,000 miles of cumulative mileage registered on its odometer may not be operated in limousine service unless the vehicle is submitted for and passes a special wheels off inspection in the presence of a Commission Enforcement Officer. This inspection shall be in addition to any routine inspection pursuant to the Motor Vehicle Code or 52 Pa. Code § 29.406.

Comments at 15.

In advocating for a 500,000 mileage limitation instead of the Commission's proposed 200,000 mileage limitation, the Limousine Association contended that the annual limousine usage per vehicle averages 60,000. Comments at 10-11. Therefore, the average limousine would reach 200,000 miles in only three and half years. Since the average limousine would reach 480,000 miles in eight years, the Limousine Association proposed a 500,000 mileage limitation. *Id.* at 10-11, fn. 16. The Limousine Association acquired these numbers through dissemination of a questionnaire to its members. *See id.*, fn. 17. The Limousine Association concluded that the Commission's proposed 200,000 mileage limitation would result in financial duress its members, who would have to purchase more limousines to comply with the proposed regulation. *Id.* at 11-12. The Limousine Association contended that consistent routine maintenance ensures the safety of vehicles with higher mileage and mitigates the need to replace those vehicles. *Id.*

#### Raymond J. Lech d/b/a Steel City Car Service

Comments were filed by Raymond J. Lech (Mr. Lech) who conducts business under the name Steel City Car Service, a limousine service. Mr. Lech did not object to the elimination of the vehicle list for limousines, but asserted that the 200,000 mileage limitation would create an "unjustifiable financial burden" on small limousine carriers like Mr. Lech. Comments at 2. Mr. Lech asserted that a 350,000 mileage limitation would be fairer and more reasonable, given that many vehicles in the limousine industry accumulate over 300,000 miles before vehicle repairs become too costly to continue operation of the vehicle. *Id.* Mr. Lech also asked for the postponement of the effective date of the regulation until one year after adoption by the Commission. Alternatively, Mr. Lech requested the possible "grandfathering" of current vehicles, only requiring the final regulation to apply to new vehicles. *Id.* at 3.

#### Cranberry/Veterans Taxi and Classy Cab

Cranberry/Veterans Taxi Inc. and Classy Cab Company Inc., both certificated operators of call and demand (taxi) service, filed joint comments objecting to the

elimination of the waiver exception to the eight year vehicle age limitation for taxis. Comments at 2. Both carriers plan to replace their current fleet with alternative fuel vehicles with longer expected engine lives – hybrid electric vehicles and vehicles fueled by compressed natural gas (CNG) and propane. Given the expected longer engine lives of those vehicles, the carriers object to elimination of the waiver exception. *Id.*

### Classic Limousine

Classic Limousine Transportation, LLC (Classic Limousine), a certificated provider of limousine service, operates sedans, SUVs, and larger limousines. Classic Limousine opposes the 200,000 mileage limitation, contending that this would have an adverse financial impact on its fleet, wherein many of the vehicles currently have or will soon have over 200,000 miles registered on their odometers. Comments at 2. Classic Limousine believes that a 300,000 mile limitation is reasonable, as well-maintained vehicles can still run safely with that level of mileage. *Id.* at 3. Classic Limousine objects to the application of mileage requirement on its sedans and SUVs, as its sedans average 50,000-60,000 miles and SUVs average 40,000-50,000 miles annually. *Id.*

### Star Limousine

Star Limousine Services Inc. (Star Limousine), a certificated limousine carrier, has 11 sedans, as well as larger limousines and other vehicles. Since seven out of 11 of Star Limousine's sedans have more than 200,000 miles, Star Limousine asks the Commission not to apply the 200,000 mileage limitation to sedans. Comments at 2. Alternatively, Star Limousine suggests increasing the mileage limitation to 350,000, especially in light of the fact that Star Limousine plans to use CNG and propane-fueled sedans, which have engine lives in excess of 500,000 miles according to Star Limousine. *Id.* at 2-3.

### White Knight Limousine

White Knight Limousine (White Knight), which has provided limousine service since 2001, stated in its comments that the vehicle age requirement for limousines caused

White Knight to lose business. White Knight supports the mileage limitation metric, but asks for the mileage requirement to be increased to 250,000 miles.

#### Regency Transportation Group

Regency Transportation Group, Ltd. (Regency) has provided limousine service since 1996, operating 25 sedans and other larger limousines. Regency has six diesel-fueled Mercedes sedans (five 2014 models and one 2012 model) and expects to purchase more diesel-fueled sedans with expected longer useful lives. Comments at 2. Since Regency averages 75,000 miles per year for each of its sedans, Regency objects to the 200,000 vehicle mileage limitation. *Id.* at 2-3. Therefore, Regency asks the Commission not to apply the mileage limitation to sedans. Alternatively, Regency suggests a mileage limitation of 300,000 miles. *Id.* at 3.

#### Erie Transportation Services

Erie Transportation Services, Inc. (Erie) provides call and demand (taxi) service in the Commonwealth. Erie believes that the proposed regulations will create a substantial and financial burden on Erie, especially in light of Erie's declining business due to declining demand. Comments at 1. Erie asserted that its older cars are regularly maintained through "extensive preventive maintenance" and "daily care." *Id.* at 2. Accordingly, Erie asks the Commission to consider a "grandfathering" clause for vehicles currently in use or an increase in the vehicle age requirement for taxis from eight to ten years. *Id.*

#### Metro Transportation

Metro Transportation of Pennsylvania, LLC (Metro) provides call and demand service. As a small business, Metro only operates one car at a time. Comments at 1. Metro voiced similar financial concerns as Erie, and also asked the Commission to consider a "grandfathering" clause for vehicles currently in use or an increase in the vehicle age requirement for taxis from eight to ten years. *Id.* at 2.

### A-1 Limousine

As one of the larger certificated carriers, A-1 Limousine, Inc. operates a fleet with over 200 vehicles. Comments at 1. A-1 Limousine objects to the 200,000 vehicle mileage limitation due to expected significant financial hardship. *Id.* A-1 explained that it routinely accrues 10,000 miles a month per vehicle and can easily maintain its vehicles within industry guidelines and specifications through the use of ASE (Automotive Service Excellence) certified mechanics. *Id.* Therefore, A-1 Limousine asserted preference for an age standard over a mileage standard. *Id.* at 2.

### A. Royal Limousine

As a small limousine company, A. Royal Limousine LLC (A. Royal) asserted that it can safely maintain older vehicles, which continue to pass Pennsylvania's annual inspection. Since A. Royal's older Lincoln stretch limousines are cost effective and safe for at least 250,000 to 300,000 miles, A. Royal "wholeheartedly" agreed with the Commission's proposal to replace the age standard with the mileage standard.

### Fantasy Limousine Service

Fantasy Limousine Service, Inc. (Fantasy) operates a fleet with one Model Year 2000 Lincoln Town Car and 10 stretch limousines. Fantasy endorses the Commission's mileage proposal, as more practical and more in line with the mission of the Commission.

### Haines Transportation Services

Haines Transportation Service, Inc. d/b/a Michael's Classic Limousine (Haines) fully supports the Commission's replacement of the vehicle age standard with a mileage standard. Comments at 1. Haines asserts that a 2003 and 2011 Lincoln Town Car are nearly visually and functionally identical. *Id.* Haines stated that many sedans travel over 70,000 miles in one year. *Id.* at 2. Since most of those miles involve highway travel, the wear and tear on the sedans is minimal. *Id.* Therefore, Haines believes a 300,000 vehicle mileage limitation is more appropriate than a 200,000 mileage limitation. *Id.*



### Infinity Limousine

Infinity Limousine, Inc. (Infinity) noted that its sedans accumulate mileage at a higher rate than its stretch limousines. Therefore, Infinity requested that the vehicle mileage limitation be increased from 200,000 to 250,000 miles.

### Jetway Transport

Jetway Transport, Inc. d/b/a Main Line Taxi & Limousine Company (Jetway) commented only on the Commission's proposal to replace the vehicle age limitation for limousines with a vehicle mileage limitation. Jetway asserted that it would experience financial hardship as a result of the 200,000 vehicle mileage limitation, as many of Jetway's limousines use between 40,000 and 60,000 miles per year. Therefore, Jetway asked the Commission not to replace the vehicle age limitation with a mileage limitation.

### Limousines For Less

As a certificated limousine carrier, Limousines For Less, Inc. (Limos For Less) staunchly opposes the proposed 200,000 vehicle mileage limitation due to expected financial hardship. Accordingly, Limos For Less asked the Commission not to replace the age standard with the mileage standard.

### Parrish Transportation

Parrish Transportation expressed frustration with the Commission's current waiver program for limousines and asked the Commission to conduct random inspections instead of the time-consuming and stressful waiver process.

### Reliable Limousine Service

Reliable Limousine Service (Reliable) operates only one vehicle, a 1994 Lincoln stretch limousine that travels less than 3,000 miles per year. Reliable expressed frustration that the proposed rules could put Reliable out of business, as Reliable could not afford to purchase another vehicle.

### Rhoads Limousine Service

Rhoads Limousine Service, Inc. (Rhoads) expressed concern about the 200,000 mileage limitation since most of Rhoads' vehicles acquire 350,000 miles during the first five to six years of service. Comments at 1. Rhoads conducts strict routine maintenance and checks for safety-related defects every 5,000-6,000 miles per vehicle. *Id.* In expressing concern that the mileage limitation could put small companies like Rhoads out of business, Rhoads asked the Commission to increase the mileage limitation to at least 350,000 miles. *Id.* at 2. Rhoads also contended that the 200,000 mileage limitation per vehicle would cause rates for customers to increase by 20-25%. *Id.*

### Ruffo's Auto Repair

Ruffo's Auto Repair (Ruffo's) fully supports the Commission's proposal to replace the vehicle age requirement with a vehicle mileage requirement for limousines. Ruffo's stated that it has a 1997 Lincoln Town Car with 38,000 miles.

### South Shore Limousine

South Shore Limousine, LLC (South Shore) expressed concern that the proposed 200,000 vehicle mileage requirement for limousines would cause South Shore unnecessary economic hardship. Comments at 1. South Shore has two vehicles, including a well-maintained, 2007 Stretch Lincoln Town Car with 224,000 miles. *Id.* South Shore ensures the safety of its limousines through inspections by state-certified mechanics, preventative maintenance, and daily care. *Id.* at 1-2. Accordingly, South Shore does not support the 200,000 mileage limitation and requested a "grandfathering clause" to provide smaller carriers with more time to invest in new vehicles. *Id.* at 2.

### Unique Limousine

Unique Limousine stressed that the safety of a limousine should not be determined by mileage alone, asserting that use and maintenance are the most important aspects to longevity of a vehicle. Unique Limousine stated that the Commission's 200,000 mileage

limitation would cause limousines to increase rates, thereby financially burdening the general public and make limousine service unaffordable to the middle class. Therefore, Unique Limousine proposed a 500,000 vehicle mileage limitation.

#### Classic British Limousine Service

Classic British Limousine Service, Inc. (British Limousine) fully endorsed the Commission's proposal to replace the vehicle age with a vehicle mileage limitation, finding the current waiver application process time-consuming and expensive.

#### A-1 Altoona Taxi

A-1 Altoona Taxi expressed concern that elimination of the Commission's waiver program for taxis older than 8 model years would result in undue financial hardship on call and demand carriers in the Commonwealth. A-1 Altoona Taxi asserted that age is not a good indicator of a vehicle's safety and that annual wheels off inspections, as well as random Commission inspections, would still ensure the safety of vehicles on the road.

#### AA Taxi Inc.

AA Taxi Inc. (AA Taxi) asserted that elimination of the Commission's waiver program would result in undue hardship on AA Taxi, who needs to utilize older taxis to stay in business. Comments at 1. AA Taxi believes Pennsylvania's annual inspections will ensure the safety of older vehicles. *Id.* Understanding that the PUC's waiver program consumes time and resources, AA Taxi proposed a streamlined waiver program, wherein the carrier files all pictures and documentation online at an earlier deadline. *Id.* at 2. If the PUC insists on eliminating the waiver program, AA Taxi asked the Commission to delay enactment of the new regulations until the beginning of 2015. *Id.*

#### City Car Services of NJ LLC

City Car Services of NJ LLC (City Car), a certificated limousine carrier, expressed concern that the 200,000 vehicle mileage limitation would create economic hardship on

its business and the citizens of Pennsylvania. Accordingly, City Car staunchly opposed the mileage limitation and requested that the vehicle age limitation remain intact.

## DISCUSSION

Upon thorough review of the above comments filed by the interested parties, the state representatives, and IRRC, we are ready to issue final-form regulations. *See* 45 P.S. § 1202; *see* 66 Pa. C.S. § 501(b) (providing the Commission the power to make regulations, as may be necessary or proper in the exercise of its powers and performance of its duties). In this effort to create reasonable regulations through the use of fair metrics that balance the interests of the motor carriers, the consumers, and the public, the Commission focused on its Mission Statement, which states:

The Pennsylvania Public Utility Commission balances the needs of consumers and utilities; ensures safe and reliable utility service at reasonable rates; protects the public interest; educates consumers to make independent and informed utility choices; furthers economic development; and fosters new technologies and competitive markets in an environmentally sound manner.

The Pennsylvania Public Utility Commission, About the PUC, *available at* [http://www.puc.pa.gov/about\\_puc.aspx](http://www.puc.pa.gov/about_puc.aspx); *see* 66 Pa. C.S. § 1301 (requiring public utility rates to be just and reasonable); *see also* 66 Pa. C.S. § 1501, 2301 (requiring adequate, efficient, safe, and reasonable services and facilities for common carriers).

### Pennsylvania Case Law

The Commonwealth Court has recently analyzed the regulations at issue in this rulemaking, providing helpful, concrete guidance and rules of law. *See Keystone Cab Serv. v. Pa. Public Utility Commission*, 54 A.3d 126, 128 (Pa. Cmwlth. 2012) (observing that the Commission carefully considered comments from the industry during the rulemaking process). In *Keystone Cab*, the appealing taxi carrier argued that the PUC could not impose stricter safety standards for vehicles used in public taxicab service than

the Pennsylvania Department of Transportation (PennDoT) imposes on private vehicles for state inspections. *Id.* at 129. Importantly for purposes of this rulemaking, the Court clarified that PennDoT only establishes “minimum standards” for private vehicles. *Id.* (quoting 75 Pa. C.S. § 4101). The Court then held that the PUC may, under its statutory mandate in the Public Utility Code, impose stricter safety standards for vehicles used in public taxicab service. *Id.* at 128-129 (citing *Harrisburg Taxicab & Baggage Co. v. Pa. PUC*, 786 A.2d 288, 292 (Pa. Cmwlth. 2001), (citing 66 Pa. C.S. § 501, § 1501)).

In *Keystone Cab*, the Court observed that the correlation between a vehicle's age and mileage and its reliability and safety is a matter of common sense and practical experience. *Id.* at 129. Accordingly, the Court held that the Commission acted well within its statutory authority in imposing the eight-year age limitation on licensed common carriers. *Id.* at 128. Furthermore, the decision as to whether or not a carrier must replace a vehicle after eight years is a decision within the regulatory purview of the Commission and not a decision reserved exclusively to the carrier's management. *Id.*

#### Vehicle Age and Mileage Standards in Other Jurisdictions

Vehicle age and mileage requirements for taxis and limousines vary significantly by jurisdiction. Unlike the PUC's statewide statutory reach through urban, suburban, and rural service territories, the jurisdiction of many taxi and limousine commissions is limited to a confined, densely populated metropolitan area. Regulations tend to be stricter in more metropolitan areas and less stringent in more rural areas, where taxis and limousines may only be subject to inspections and not age/mileage limitations.

The Philadelphia Parking Authority (PPA), which regulates taxis and limousines operating in Philadelphia County, requires a taxicab to retire upon surpassing the age of eight model years or 250,000 miles. 52 Pa. Code § 1017.4(a).<sup>2</sup> The PPA also has more

---

<sup>2</sup> PPA's hybrid age and mileage limitation approach was approved by IRRC and therefore enjoys a presumption of reasonableness.

extensive rules for vehicle entry mileage and basic vehicle standards. 52 Pa. Code §§ 1017.4(b), 1017.5. The PPA’s vehicle age/mileage rules do not have language similar to the Commission’s current “unless otherwise permitted” language that created the waiver program. However, the PPA does allow for petitions for waiver for antique vehicles. *See* 52 Pa. Code § 1017.4(c). As to limousines, the PPA does not allow a limousine older than eight years to operate. 52 Pa. Code § 1055.3(b) (providing an exception for antique limousines that pass a compliance exception). The PPA also has a 350,000 cumulative mileage limitation for limousines. 52 Pa. Code § 1055.3(c) (allowing a one year extension for vehicles that pass a compliance inspection).

Similar to the PPA, the District of Columbia Taxicab Commission has a dual mileage/age approach for taxis. Effective January 1, 2018, a vehicle may not operate in taxicab service in D.C. if the vehicle is more than 7 model years old or has accumulated in excess of 400,000 miles.<sup>3</sup> The Code of the Metropolitan Government of Nashville and Davidson County Tennessee<sup>4</sup> requires that a taxicab must be no older than nine model years. Ord. No. BL2011-81, Ch. 6.72.245. There is no mileage limit for taxis. A limousine must be no older than 10 model years or must not have more than 350,000 miles registered on its odometer. Ord. No. BL2011-81, Ch. 6.72.245, Ch. 6.74.230.

In New York City, the New York City Taxi & Limousine Commission (TLC) promulgated a general rule that taxicabs must retire after 60 months (five years) of service. 35 R.C.N.Y. § 67-18(b). There are retirement date extensions, including a 12 month extension of allowable service for demonstration of a financial hardship by an independent taxicab owner or long-term driver, a 24 month automatic extension for use of a CNG vehicle, specific minivan extensions, and specific extensions for clean air and wheelchair accessible taxicabs. 35 R.C.N.Y. § 67-18(b). While there are no general

---

<sup>3</sup> *See* <http://www.dcregs.dc.gov/Gateway/RuleHome.aspx?RuleID=15440>.

<sup>4</sup> The Transportation Licensing Commission licenses taxis and limousines in Nashville and Davidson County. *See* <https://law.resource.org/pub/us/code/city/tn/Metropolitan%20Government%20of%20Nashville%20and%20Davidson%20County,%20TN%20Code%20thru%20supp%20%2313%20VOL%20I.pdf> at p. CD6.74:9.

mandatory vehicle age restrictions for limousines, there are significant vehicle alteration regulations as well as specific retirement schedules for certain vehicles. 35 R.C.N.Y. § 59A-28(a), (d). A limousine must be removed from service if the TLC or the New York State Department of Motor Vehicles determines the vehicle is unsafe or unfit for use. 35 R.C.N.Y. § 59A-27(a)(1).

In contrast to the above metropolitan area commissions, Arizona regulates the licensing of taxis and limousines on a statewide basis. Finding that the regulation of taxis and limousines is a statewide concern, Arizona preempts the regulation of taxis and limousines at the local level, unless conducting business at a public airport. A.R.S. § 28-142.<sup>5</sup> The Arizona Department of Weights and Measures, which processes licenses for taxi and limousine operation throughout the state, does not have specific mileage and age limitations for taxis and limousines, but requires vehicle inspection appointments and vehicle maintenance records.<sup>6</sup>

#### Industry Statistics on Vehicle Age and Mileage For Taxis and Limousines

In 2012, the Taxicab, Limousine & Paratransit Association (TLPA)<sup>7</sup> issued two comprehensive reports on statistics in the taxicab industry and the limousine and sedan industry. The TLPA determined that the average annual total miles per taxi in 2011 was 53,409.<sup>8</sup> In the year 2011, the average model year for taxis was 2005.6.<sup>9</sup> For taxis in fleets with less than 24 vehicles, the average model year was 2003.9.<sup>10</sup> The average age limit was 8 years overall, but 10 years for taxis in fleets with fewer than 24 vehicles.<sup>11</sup>

---

<sup>5</sup> There have been legislative efforts to amend this preemption statute. See 2014 AZ H.B. 2262 (NS).

<sup>6</sup> See <http://www.azdwm.gov/?q=resource/vehicles-hire-licensing>.

<sup>7</sup> The TLPA is the leading national association for information, education, and legislative resources in the passenger transportation industry. <http://www.tlpa.org/about/index.cfm>.

<sup>8</sup> 2012 TLPA Taxicab Fact Book: Statistics on the U.S. Taxicab Industry (Sep. 2012), at p. 3.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

For 51.2% of the members surveyed in TLPA's study, there was no applicable age limit for taxis.<sup>12</sup>

The TLPA determined that the average annual total miles was 29,367 for SUVs, 46,804 for sedans, and 15,163 for stretch limousines.<sup>13</sup> The TLPA did not acquire statistical information on the average ages of limousines and sedans, but did conclude that new sedans and new SUVs were purchased much more frequently in 2011 than new stretch limousines.<sup>14</sup>

### Technology and Safety Standards and Considerations

Over time, motor vehicles have become safer due to improved safety technologies and features, some of which are mandatory under the law. The National Highway Traffic Safety Administration, part of the United States Department of Transportation, promulgates Federal Motor Vehicle Safety Standards and Regulations.<sup>15</sup> Historic safety technologies included seat belts, improved lighting, airbags, and anti-lock brakes. Modern improvements, such as side airbags have contributed to a substantial reduction in death risks in cars and SUVs.<sup>16</sup> More recent safety technology features include Electronic Stability Control (assists in braking), Automatic Crash Notification (alerts emergency responders), Lane Departure Warning, Backup Cameras (sensors detect vehicles behind), Forward Collision Warning (sensors that detect vehicles ahead), and Frontal Pedestrian Impact Mitigation Braking (automatic braking to help avoid impact with pedestrian).<sup>17</sup> Since 1975, the rate of motor vehicle crash deaths per 100,000 people has declined by about half.<sup>18</sup> This decrease in death rate has been largely attributed to

---

<sup>12</sup> *Id.*

<sup>13</sup> 2012 TLPA Limousine & Sedan Fact Book: Statistics on the U.S. Limousine & Sedan Industry (Sep. 2012), at p. 10.

<sup>14</sup> *Id.* at 11.

<sup>15</sup> See <http://www.nhtsa.gov/Laws-Regs>.

<sup>16</sup> See <http://www.iihs.org/iihs/news/desktopnews/side-airbags-substantially-reduce-death-risk-in-cars-and-suvs-those-that-protect-peoples-heads-are-especially-effective>.

<sup>17</sup> Safercar.gov, Safety Technology, available at [http://www.safercar.gov/staticfiles/safetytech/st\\_landing\\_ca.htm](http://www.safercar.gov/staticfiles/safetytech/st_landing_ca.htm).

<sup>18</sup> See The Insurance Institute For Highway Safety, General Statistics, Fatality Facts, available at <http://www.iihs.org/iihs/topics/t/general-statistics/fatalityfacts/overview-of-fatality-facts>.



safer vehicles with improved safety technology.<sup>19</sup> Since safety technology continues to improve (and often becomes mandatory in new vehicle construction), the newer the vehicle, the safer the vehicle. With these safety and technology considerations in mind, we will discuss and dispose of the public comments in rendering our final-form regulations.

### **Disposition of Comments to Call and Demand (Taxi) Service Regulations**

#### Vehicle List Requirement at 52 Pa. Code § 29.314(c)

Very few commenters specifically discuss, let alone oppose the Commission's proposed elimination of the vehicle list requirement at 52 Pa. Code § 29.314(c). Instead of completely eliminating the vehicle list requirement, GPTA proposed new language that would require limited reporting of a carrier's vehicles that will exceed the eight year age limitation during the next twelve months in order to schedule an inspection that would potentially result in a waiver of an older vehicle deemed safe upon completion of a "wheels off" inspection. Comments at 3-4. We appreciate GPTA's efforts to create a more efficient system that would potentially allow older, yet safer, vehicles to still operate. However, GPTA's desire for the vehicle list hinges on the Commission's decision to maintain the waiver program. We find that elimination of a formal waiver program, as discussed below, and elimination of the vehicle list requirement is in the public interest. As discussed in our Proposed Rulemaking Order, the vehicle list requirement proved to be an ineffective tool at allowing Commission staff to maintain up-to-date, accurate information of a carrier's fleet for the purpose of aiding in Commission enforcement efforts. *See* Docket No. L-2013-2349042 at p. 4-5 (Order entered Apr. 5, 2013). Accordingly, in light of our findings and minimal opposition in the comments, we will eliminate the vehicle list requirement at 52 Pa. Code § 29.314(c). *See Annex A.*

---

<sup>19</sup> *See, e.g.,* <http://www.iihs.org/iihs/news/desktopnews/declining-death-rates-due-to-safer-vehicles-not-better-drivers-or-improved-roadways>.

### Vehicle Age Requirement at 52 Pa. Code § 29.314(d)

The Commission's proposal to eliminate the waiver exception for taxis older than eight model years did receive some disapproving comments, mainly from carriers asserting that elimination of the waiver exception would cause financial hardship to carriers. *See* Bux-Mont Comments at 1, 3 (endorsed by State Representative Thomas Murt); GPTA Comments at 6, 15 (endorsed by Central Pennsylvania Taxicab Association); Cranberry / Veterans Taxi and Classy Cab Comments; Erie Comments at 1; Metro Comments at 1-2; A-1 Altoona Taxi Comments; AA Taxi Comments at 1. Due to these assertions by the taxi carriers who submitted comments<sup>20</sup>, IRRC expressed concern that elimination of the waiver exception could result in severe consequences for those carriers. Comments at 3. IRRC and some taxi carriers asked the Commission to delay the effective date of the proposed regulations in order to provide the carriers with time to comply with the regulation and avoid experiencing financial hardship. IRRC Comments at 3; Erie and Metro Comments at 2 (requesting a "grandfathering clause" for older vehicles currently in service); AA Taxi Comments at 2.

While we are very sensitive to the financial concerns of the smaller carriers, we must strike a balance between the financial needs of the carriers and our public safety obligations to consumers. Accordingly, we have proceeded deliberately with the implementation of this rulemaking, carefully reviewing the public comments in response to our April 5, 2013 Proposed Rulemaking Order before issuing this Final Rulemaking Order. Furthermore, we will delay the effective date of these final-form regulations until six months after the regulations are published in the Pennsylvania Bulletin to allow time for carriers to adapt to these new public safety standards.

Also, throughout the 2014 calendar year we have been and will continue to accept waiver applications from carriers requesting to use vehicles older than eight model years in taxi service for the 2015 calendar year. We will allow vehicles whose 2014 waiver

---

<sup>20</sup> We note that not all Commission-licensed call and demand carriers or interested parties submitted comments.

applications were approved to be used in taxi service throughout the course of the 2015 calendar year. However, we will not accept and process waiver applications in the 2015 calendar year from carriers requesting to use older vehicles for the 2016 calendar year. Thus, the last day a vehicle older than eight years, whose waiver application was approved, could be used in taxi service is December 31, 2015. We believe this timeframe is more than sufficient to allow carriers to prepare and invest accordingly.

Instead of eliminating the waiver exception, some carriers suggested that the Commission maintain the waiver program and stagger dates by which taxicab carriers must file waiver requests. Bux-Mont Comments at 1-2; *see also* AA Taxi Comments at 2 (suggesting electronic filing of documents and pictures of vehicles with waiver requests). Then, the Commission's Enforcement Officers could conduct "wheels-off" inspections for taxis that will soon surpass the Commission's eight model year age limitation. GPTA Comments at 4-5 (endorsed by Central Pennsylvania Taxicab Association); A-1 Altoona Taxi Comments. Commenters suggest this process would be fairer, result in greater efficiencies and cost-savings, and ease the Commission's administrative burden by allowing Enforcement Officers to conduct inspections alongside other enforcement activities. Bux-Mont Comments at 1-2; GPTA Comments at 4-5.

We appreciate these alternative proposals from the commenters. However, upon further examination, we find that maintaining the waiver program through the use of staggered inspections does not sufficiently remove the administrative burden and save costs. Simply put, the Commission's current complement of Enforcement Officers do not have the time and availability to conduct multiple "wheels off" inspections for taxis at staggered intervals throughout the year. The Commission's 40 Enforcement Officers are responsible for conducting investigations, safety audits, and driver/vehicle inspections in all 67 counties. The bulk of an Enforcement Officer's inspection time is spent on large commercial vehicles, including large trucks, buses, and full-size motor coaches under the federal Motor Carrier Safety Assistance Program (MCSAP) program. The job duties of

an Enforcement Officer also include issuing traffic and non-traffic citations and recommending Commission complaints; providing testimony at Commission hearings, District Justice hearings, and County Common Pleas Courts; conducting safety fitness reviews of motor carrier applicants; preparing detailed reports of investigations and inspections with analyses and recommendations; maintaining the high condition and functionality of an assigned patrol vehicle; and flexibility to travel and work outside assigned counties. Enforcement Officers must also maintain an effective knowledge of pertinent Public Utility transportation statutes and regulations, the Pennsylvania Motor Vehicle Code, the Pennsylvania Department of Transportation Vehicle Equipment and Inspection Manual, the Federal Motor Carrier Safety Regulations, and the Hazardous Material Regulations. Therefore, the Commission does not have the personnel to conduct additional inspections on the vehicles of small passenger carriers.

Some commenters questioned the regulatory metric, contending that a vehicle's age is not a true indicator of a vehicle's safety. A-1 Altoona Taxi Comments; GPTA Comments at 3, 6. We disagree, as correlation between a vehicle's age and its reliability and safety is a matter of common sense and practical experience. *See Keystone Cab*, 54 A.3d at 129; *see also* 52 Pa. Code § 1017.3(b)(1), 35 R.C.N.Y. § 67-18(b) (establishing a general rule for a 5 year vehicle age cap in New York City and a 8 year age cap and 250,000 mileage limitation in Philadelphia). While acknowledging that age can be a factor in vehicle safety, Erie insisted that its older vehicles could be maintained through "extensive vehicle maintenance" and "daily care." Comments at 2. However, generally, older vehicles wear down and the Commission does not have the resources to conduct inspections at the frequency required to ensure the ongoing safety of these vehicles. Aside from carriers' assurances of self-maintenance, a few carriers suggested that Pennsylvania's annual state vehicle inspections are sufficient to ensure the safety of older vehicles, rendering an additional inspection by a PUC Enforcement Officer unnecessary. *See, e.g., AA Taxi Comments* at 1. However, the Commonwealth Court has stated that since Title 75 in the Motor Vehicle Code only establishes "minimum standards" for

*private* vehicles, the PUC may, under its statutory mandate in the Public Utility Code, impose stricter safety standards for vehicles used in *public* taxicab service.<sup>21</sup> See *Keystone Cab*, 54 A.3d at 128-129. Furthermore, the vehicle at issue could easily deteriorate and become unsafe over the course of the year after the state annual inspection. Also, the safety features of older vehicles become technologically outdated over the course of time.

The Commission finds that the use of new vehicles in taxi service can enable carriers to save costs in the long-term. Ongoing maintenance for older vehicles may be cost-prohibitive, as a carrier may find that investment in new vehicles actually results in total savings in the long-term. Commission staff informally asked a few smaller carriers to compare the costs and benefits of maintaining vehicles older than eight model years versus purchasing new vehicles. Burgit's City Taxi<sup>22</sup> (Burgit's) of Wilkes-Barre, a mid-size carrier with approximately 15 vehicles, estimates that older vehicle maintenance costs are \$1,000 per month compared to new vehicle maintenance at \$350 or less per month. Burgit's also estimates an approximate 35% in fuel savings by using the newer vehicles. Yellow Cab of Lebanon, a smaller carrier with approximately six vehicles, estimates a 40% reduction in maintenance costs due to a recent purchase of new vehicles. Both Burgit's and Yellow Cab of Lebanon believe that their new vehicles have increased their businesses, as the public appreciates their new vehicles. Accordingly, we find unpersuasive the generalized assertions that carriers will be unduly financially burdened as a result of having to invest in new vehicles.

Some commenters asked the Commission to replace the taxi age limitation with a mileage limitation, as we have proposed for vehicles used in limousine service. Bux-Mont Comments at 3 (endorsed by State Representative Thomas Murt); GPTA Comments at 6-14. Given the faster rate of mileage accumulation by taxis as compared

---

<sup>21</sup> Unlike private passenger vehicles, taxicabs transport the public on a daily basis, often operating 20-24 hours a day.

<sup>22</sup> See <http://burgitcitytaxi.com/>.

to limousines, the Commission had found that an age limitation for taxis (1) provides a clear and fair standard for the industry and (2) is a viable and efficient tool for the Commission to utilize in ensuring safe and reliable taxi service for the public. Importantly, Bux-Mont and GPTA observe that taxicabs used in suburban and rural areas do not accumulate mileage like taxicabs used in more urban areas. Bux-Mont Comments at 3; GPTA Comments at 6-7, 15 (also asserting that an absolute 8 year limit would prevent the use of safe, antique vehicles). GPTA further contends that an “absolute” eight year vehicle age limitation would require faster vehicle turnover and impact smaller carriers with less financial flexibility. Comments at 12-14.

We are persuaded by the concerns and proposals in the above comments. True, an eight year vehicle age limitation is accommodating and less stringent than or on par with the general rules for taxi service in Philadelphia and New York City. *See* 52 Pa. Code § 1017.4, 35 R.C.N.Y. § 67-18(b). However, unlike the PPA, which only regulates taxicabs in a geographically contiguous, metropolitan area with a dense urban population, we regulate taxicabs in urban, suburban, and rural areas with greater variability regarding population density, geographic terrain and road conditions, supply of carriers, and customer demand for service. Establishing a simple, singular regulatory metric for taxi service based on model age alone does not sufficiently account for this variability. A purely model year age limitation metric may allow the use of taxis with excessive cumulative mileage, but still under the 8 model year age limitation.

GPTA admits that taxis with more than 400,000 miles are currently employed in service. Comments at 13. A purely mileage limitation for taxis could allow for the use of vehicles older than 10, 15, or 20 years. As explained, the use of older vehicles is not in the public interest, as older vehicles do not have the latest technology and safety features. Accordingly, a dual age/mileage standard will ensure that vehicles without the latest technology and safety features and vehicles with excessive-use related defects are retired from fleets at a reasonable and appropriate time. The dual mileage/age approach

enjoys a presumption of reasonableness, as IRRC approved PPA's current standard of an 8 model years or a 250,000 mileage limitation, whichever comes first. *See* 52 Pa. Code § 1017.4(a). Therefore, based on the comments received and upon further review and analysis, we find that a dual mileage/age limitation metric for taxis is in the public interest.

In implementing the mileage limitation, we stress that we will not tolerate carriers who roll back the odometers in an effort to prolong the lifespan of a vehicle beyond 350,000 miles, which is a very reasonable and accommodating standard. A carrier who has unlawfully tampered with an odometer is subject to state and federal liabilities, fines, and potential imprisonment. *See* 49 U.S.C. § 32709 (federal liability); 75 Pa. C.S. § 7138 (Pennsylvania civil and criminal liability); 75 Pa. C.S. § 7139 (Pennsylvania corporate liability).

In determining the appropriate mileage limitation for taxis, we note that the TLPA found that the average annual total miles per taxi in 2011 was 53,409. Thus, in eight years, the average taxi accumulates 427,272 miles. In other jurisdictions, mileage limitations range from 250,000 (e.g., the PPA) to 400,000 (e.g., D.C.) to unlimited (e.g., Arizona). Currently, taxis with over 400,000 miles are operating in the Commonwealth. We find that allowing taxis to operate with over 350,000 cumulative miles is not in the public interest, as such excessive cumulative mileage potentially creates a higher likelihood of an unsafe vehicle that endangers public safety. IRRC has approved the 250,000 mileage limitation for taxis operating in Philadelphia County. We find that a higher 350,000 mileage limitation for taxis operating outside of Philadelphia is reasonable and appropriate in light of the above statistics and the variability regarding population density, geographic terrain and road conditions, supply of carriers, and customer demand for service in driving conditions throughout the Commonwealth, as compared to the geographically contiguous and densely populated Philadelphia County. Thus, we will establish a 350,000 mileage limitation for taxis.

In light of the elimination of the Commission's waiver program, some parties recommended increasing the model year age limitation from 8 to 10 years. *See* GPTA Comments at 16-17, Erie Comments at 2, Metro Comments at 2. In determining the appropriate age limitations for taxis, we note that the TLPA found that the average age limit was 8 years overall, but 10 years for taxis in fleets with fewer than 24 vehicles. In the year 2011, the average model year was 2003.9 for taxis in fleets with less than 24 vehicles. For 51.2% of the members surveyed in TLPA's study, there was no applicable age limit for taxis.

Based on the above statistics and in response to the litany of comments expressing financial concerns of smaller carriers upon elimination of the Commission's waiver program, we will increase the model year age limitation from 8 to 10 years. *See* Bux-Mont Comments at 1, 3 (endorsed by State Representative Thomas Murt); GPTA Comments at 6, 15 (endorsed by Central Pennsylvania Taxicab Association); Cranberry / Veterans Taxi and Classy Cab Comments; Erie Comments at 1; Metro Comments at 1-2; A-1 Altoona Taxi Comments; AA Taxi Comments at 1. Notably, the 10 year model age limitation will be restrained by a mileage limitation so that a taxi under 10 model years of age with more than 350,000 miles is not on the road.

Accordingly, in establishing a dual mileage/age metric, the final form regulation will provide:

A vehicle that is more than 10 model years old or has more than 350,000 miles of cumulative mileage registered on its odometer may not be operated in call and demand service.

*See* Annex A. Importantly, the vehicle will not be allowed to operate upon the occurrence of either condition – surpassing the 10 model year age limit or the 350,000 mileage limit. Thus, once a vehicle reaches either the age or mileage limit, that vehicle will not be allowed to operate in call and demand service.



While we are eliminating the waiver program to save Commission time and resources, we believe that increasing the model year age by two years in tandem with a 350,000 mileage limitation generously accommodates smaller carriers throughout the Commonwealth. Carriers will now have the flexibility to effectively utilize vehicles in their current fleets before those vehicle age or mileage out and have sufficient preparation time to invest in new vehicles. While these standards are very accommodating, we still believe it is important to set firm regulatory limits in the interest of public safety.

IRRC and GPTA contend that allowing a carrier to file a petition for waiver pursuant to 52 Pa. Code § 5.43 would not eliminate the administrative burden, but simply transfer and potentially increase the burden on the Commission and carriers. IRRC Comments at 3; GPTA Comments at 9-12. Based on our explanations of and adjustments to the regulations in this final rulemaking and the more formal requirements attendant to the filing of a petition for waiver with the Commission as compared to submitting a waiver application to the Commission's Bureau of Technical Utility Services, we do not believe a simple transfer of administrative burden on the Commission will result. As GPTA notes, filing Petitions for Waiver under 52 Pa. Code § 5.43 requires more time, expenses, and resources from carriers than submitting documents to Commission staff under a waiver program. *See* Comments at 10-12. Therefore, it is only in a carrier's economic and temporal interest to file a petition for waiver for older vehicles in very good condition. Under our waiver program, we received multiple incomplete applications requiring re-submission from the carrier and multiple applications for vehicles in mediocre or poor condition, which resulted in denial of the waiver requests. We will not exert extensive Commission resources to process incomplete petitions or petitions for waiver for vehicles in mediocre or poor condition.<sup>23</sup> Accordingly, we do not expect an onslaught of petitions for waiver, especially in light of the fact that we are

---

<sup>23</sup> *See Pa. PUC, Bureau of Technical Utility Services v. TJT Inc. t/d/b/a A&A Limousine Service*, Docket Nos. P-2014-2400725 and A-00111863 (Pa. P.U.C. Feb. 20, 2014) (denying petition for waiver for limousines in carrier's fleet older than 8 model years).

increasing the model year age limitation from 8 to 10 years.

Cranberry/Veterans Taxi and Classy Cab objected to the elimination of the waiver program because both carriers plan to replace their current fleet with alternative fuel vehicles with longer expected engine lives – hybrid electric vehicles and vehicles fueled by CNG and propane. Comments at 2; *see* Veterans Taxi, *available at* <http://www.startransportationgroup.com/veterans/> (emphasizing that its fleet is powered by American-made natural gas). In light of the growing use and commercial viability of alternative fuel vehicles (AFVs), numerous programs at the national, state, and county level have been promoting the use of AFVs to increase fuel efficiency and curb carbon dioxide emissions. The federal government has spearheaded multiple initiatives to incentivize the use of alternative fuels and AFVs.<sup>24</sup> The Pennsylvania Department of Environmental Protection (DEP) administers an Alternative Fuel Rebate Program<sup>25</sup> and a Natural Gas Vehicle Program<sup>26</sup> to incentivize AFV purchases. *See* 73 P.S. § 1647.3 (establishing an Alternative Fuels Incentive Fund). In 2013 Bradford County purchased natural gas vehicles through the DEP grant program.<sup>27</sup> On March 14, 2014, Governor Tom Corbett awarded 25 grants, funded by Act 13 impact fees,<sup>28</sup> to companies and organizations throughout Pennsylvania for heavy-duty fleet vehicles fueled by natural gas.<sup>29</sup> The Pennsylvania Turnpike Commission has already installed electric vehicle charging stations on the Turnpike and is currently exploring the installation of CNG

---

<sup>24</sup> *See* U.S. Dept. of Energy, Alternative Fuels Data Center, Federal Laws and Incentives, *available at* [http://www.afdc.energy.gov/laws/fed\\_summary](http://www.afdc.energy.gov/laws/fed_summary) (last accessed July 18, 2014).

<sup>25</sup> *See* Pennsylvania Department of Environmental Protection, Alternative Fuel Vehicle Rebate Program, *available at* [http://www.portal.state.pa.us/portal/server.pt/community/alternative\\_fuels\\_incentive\\_grant/10492/alternative\\_fuel\\_vehicles/553206](http://www.portal.state.pa.us/portal/server.pt/community/alternative_fuels_incentive_grant/10492/alternative_fuel_vehicles/553206).

<sup>26</sup> *See* Pennsylvania Department of Environmental Protection, Natural Gas Vehicle Program, *available at* [http://www.portal.state.pa.us/portal/server.pt/community/act\\_13/20789/natural\\_gas\\_vehicle\\_program/1157504](http://www.portal.state.pa.us/portal/server.pt/community/act_13/20789/natural_gas_vehicle_program/1157504)

<sup>27</sup> *See, e.g.*, James Loewenstein. *Bradford County Now Has Vehicles That Run On Natural Gas* (Aug. 20, 2013), <http://thedailyreview.com/news/bradford-county-now-has-vehicles-that-run-on-natural-gas-1.1538548>.

<sup>28</sup> Act 13 of 2012 imposes an unconventional gas well fee on the companies engaged in natural gas drilling in the Commonwealth due to the impact of the drilling on surrounding communities and the environment. 58 Pa. C.S. § 2301 *et. seq.* The PUC administers the collection and disbursement of the fee. *See* [http://www.puc.state.pa.us/filing\\_resources/issues\\_laws\\_regulations/act\\_13\\_impact\\_fee.aspx](http://www.puc.state.pa.us/filing_resources/issues_laws_regulations/act_13_impact_fee.aspx).

<sup>29</sup> Governor Corbett Awards 25 Grants for Natural Gas Vehicle Conversion, March 21, 2014 Press Release, *available at* <http://www.pa.gov/Pages/NewsDetails.aspx?agency=Governors%20Office&item=15409>.

stations.<sup>30</sup>

As part of our mission, the Commission endeavors to further economic development and foster new technologies and competitive markets in an environmentally sound manner. Accordingly, in light of the aforementioned state programs and the environmental benefits and economic opportunities attendant to alternative fuels, we find that incentivizing the use of AFVs in motor carrier passenger service is in the public interest. Therefore, the Commission will provide explicit language in our regulations at 52 Pa. Code § 29.314 that extends the vehicle age limitation for AFVs to 12 model years or 350,000 miles registered on the odometer, whichever comes first. *See Annex A.* However, AFVs will still be subject to random “four wheels off” inspections conducted by the Commission’s Enforcement Officers and must still pass annual state inspections.

In our final-form regulations in Annex A, we reference the Pennsylvania Motor Vehicle Code for the definitions of *alternative fuels*, *electric vehicle*, and *hybrid electric vehicle*, which are as follows:

*“Alternative fuels.”* Natural gas, compressed natural gas (CNG), liquified natural gas (LNG), liquid propane gas and liquified petroleum gas (LPG), alcohols, gasoline-alcohol mixtures containing at least 85% alcohol by volume, hydrogen, hythane, electricity and any other fuel used to propel motor vehicles on the public highways which is not taxable as fuels or liquid fuels under this chapter.

*“Electric vehicle.”* A motor vehicle which operates solely by use of a battery or battery pack and which meets the applicable Federal motor vehicle safety standards. The term includes a motor vehicle which is powered mainly through the use of an electric battery or battery pack but which uses a flywheel that stores energy produced by the electric motor or through regenerative braking to assist in operation of the motor vehicle.

*“Hybrid electric vehicle.”* An electric vehicle which allows power to be delivered to the drive wheels solely by a battery-powered electric motor but which also

---

<sup>30</sup> *See* Electric-Vehicle Charging Available at Two Pa. Turnpike Service Plazas (Apr. 21, 2014), <http://www.paturnpike.com/Press/2014/20140421120629.htm>

incorporates the use of a combustion engine to provide power to the battery and which meets the applicable Federal motor vehicle safety standards. The primary source of power for the motor must be the electric battery or battery pack and not the combustion engine.

75 P.S. §§ 102, 9001. Importantly, the definition of *alternative fuels* includes CNG, propane, and electricity, the sources or fuels that Cranberry/Veterans Taxi and Classy Cab use and plan to use in their fleets. The broader, more all-encompassing definitions will allow for other technologies that develop and become more viable in the future. Therefore, we will state in our regulations that the vehicle age limitation for taxis shall not apply to *electric vehicles*, *hybrid electric vehicles*, and vehicles utilizing *alternative fuels*, as defined in the Motor Vehicle Code in Title 75 of the Pennsylvania Consolidated Statutes. See Annex A. In allowing extended use for AFVs, we encourage and expect carriers to use new vehicles in their fleet, similar to the vehicles used by Veterans Taxi. See <http://www.startransportationgroup.com/-veterans/>. We strongly discourage retrofitting older vehicles in an effort to qualify for this exemption. Since older vehicles present other safety considerations, regardless of the type of engine or the expected life of that engine, we will not issue a blanket, unlimited exemption for AFVs.

### **Disposition of Comments to Limousine Service Regulations**

#### **Vehicle List Requirement at 52 Pa. Code § 29.333(d)**

Very few commenters discuss, let alone oppose the Commission's proposed elimination of the vehicle list requirement at 52 Pa. Code § 29.333(d). Instead of completely eliminating the vehicle list requirement, the Limousine Association proposed new language that would require limited reporting of a carrier's vehicles that will "age or mileage out" in the next twelve months in order to schedule an inspection that would potentially result in a waiver of an older vehicle deemed safe upon completion of a "wheels off" inspection. Comments at 3-5. We appreciate the Limousine Association's efforts to create a more efficient system that would potentially allow older, yet safer, vehicles to still operate. However, the Limousine Association's desire for the vehicle list

hinges on the Commission's decision to maintain a formal waiver program. We find that elimination of the waiver program, as discussed below, and elimination of the vehicle list requirement is in the public interest. As discussed in our Proposed Rulemaking Order, the vehicle list requirement proved to be an ineffective tool at allowing Commission staff to maintain up-to-date, accurate information of a carrier's fleet for the purpose of aiding in Commission enforcement efforts. Accordingly, in light of our findings and minimal opposition in the comments, we will eliminate the vehicle list requirement at 52 Pa. Code § 29.333(d).

#### Vehicle Age Requirement at 52 Pa. Code § 29.333(e)

The Commission's proposal to replace the vehicle age requirement with a mileage requirement for limousines received general support. *See* Comments of State Representatives Tim Krieger, Kerry Benninghoff, and C. Adam Harris; White Knight Comments; A. Royal Comments; Fantasy Limousine Comments (contending that the mileage requirement is more practical and in line with the Commission's mission); Haines Comments at 1; Ruffo's Comments; British Limousine Comments; Reliable Comments; Parrish Transportation (supporting elimination of the stressful and time-consuming waiver process). Only a few commenters opposed the mileage metric and requested that the vehicle age limitation remain intact. *See* City Year Comments; Limos For Less Comments; Jetway Comments; A-1 Limousine Comments.

Although the majority of commenters were overwhelmingly supportive of the change in metric from an age cap to a mileage cap, most commenters requested the Commission to increase the mileage limitation beyond 200,000 miles, as the 200,000 cap would require faster vehicle turnover and result in financial burdens to the carriers. Therefore, IRRC asked the Commission to reevaluate the proposed 200,000 mileage limitation to determine the appropriate mileage cap that balances public interest safety concerns with the potential adverse fiscal impact on carriers. Comments at 3-4.

As to the lower counter-proposed mileage limitations, Infinity and White Knight propose a 250,000 mileage cap. *See* Comments. A. Royal asserts that its older Lincoln stretch limousines are cost effective and safe for at least 250,000 to 300,000 miles. *See* Comments. Haines proposes a 300,000 mileage cap, explaining that many of its sedans travel over 70,000 miles a year. Comments at 2. Similarly, Regency proposes a 300,000 mileage cap, explaining that many of its sedans travel over 75,000 miles a year. Comments at 3. Classic Limousine also believes a 300,000 mileage cap is reasonable, explaining that many of its sedans average 50,000-60,000 miles and its SUVs average 40,000-50,000 miles annually. Comments at 3. Mr. Lech believes a 350,000 mileage limitation is fair and reasonable, given that many vehicles in the limousine industry accumulate 300,000 miles before vehicle repairs become too costly to continue using the vehicle. Comments at 2. Star Limousine also suggests increasing the mileage limitation to 350,000 miles, especially in light of the high mileage on its sedans. Comments at 2-3.

On the high end, Unique Limousine and the Limousine Association proposed a 500,000 mileage limitation. *See* Limousine Association Comments at 10-15. Unique Limousine did not explain how it arrived at the 500,000 mileage cap proposal. The Limousine Association arrived at its proposal upon compiling data from the results of a questionnaire disseminated to its members. Comments at 10-11. In proposing the 500,000 mileage limitation, the Limousine Association used a 60,000 average annual vehicle mileage for eight years, resulting in a total of 480,000 miles. *See id.* Notably, the Limousine Association stated that “annual usage per vehicle *can* average 60,000 miles.” *Id.* at 10 (emphasis added); *see* fn. 16 (invoking the anecdote of King Limo’s experience). The Limousine Association arrived at this 60,000 mile average anecdotally and not representationally by averaging annual vehicle usage from all of its members. Importantly, the Limousine Association did not discuss in its comments the individual carrier results obtained from its other members regarding a carrier’s average annual vehicle mileage. Thus, we find the Limousine Association’s counter-proposal of 500,000 miles unpersuasive and unsubstantiated.

Accordingly, we find that the 500,000 mileage limitation request too high and not effectively supported. The next highest request, a 350,000 vehicle mileage limitation, appears fairer and more reasonable. The PPA also requires a 350,000 vehicle mileage limitation for limousines operating in Philadelphia County. 52 Pa. Code § 1055.3(c). However, before rendering a determination on these grounds alone, we will examine additional statistical findings. According to the 2012 TLPA Limousine & Sedan Fact Book, stretch limousines average 15,163 annual miles, passenger vans average (15 or fewer passengers) average 19,564 annual miles, SUVs average 29,367 annual miles, and sedans average 46,804 annual miles.

As indicated by the TPLA statistics and the comments to this rulemaking, sedans will be the first vehicles in danger of exceeding the Commission's 200,000 vehicle mileage limitation. *See* Infinity Comments. Since 7 out of 11 of Star Limousine's sedans have more than 200,000 miles, Star Limousine asked the Commission not to apply the 200,000 vehicle mileage limitation to sedans. Comments at 2. Classic Limousine objected to the application of the vehicle mileage requirement on its sedans that annually average 50,000-60,000 miles and its SUVs that annually average 40,000-50,000 miles. Comments at 3. Since Regency averages 75,000 miles per year for each of its sedans, Regency asked the Commission to increase the mileage limitation to 300,000 miles. Comments at 3. Similarly, since Haines averages 75,000 miles per year for each of its sedans, Haines asked the Commission to increase the mileage limitation to 300,000 miles. Comments at 2; *see also* Rhoads Comments at 2 (asking the Commission to increase the mileage limitation to 350,000 miles).

Based on our further consideration of the TPLA statistics, the public comments, and the requirements in other jurisdictions (e.g., the 350,000 mileage limitation in Nashville and Davidson County), we find that increasing the vehicle mileage limitation in 52 Pa. Code § 29.333 for vehicles operating in limousine service to 350,000 miles is fair, reasonable, and in the public interest. *See* Annex A.

A few commenters suggested that routine preventative maintenance and annual state inspections could keep their limousines safe well beyond 200,000 miles. *See* South Shore Comments at 1-2; Unique Limousine Comments; Rhoads Comments at 1; A-1 Comments at 1 (asserting its vehicles accrue 10,000 miles per month); Limousine Association Comments at 11-12. We agree that effective maintenance can prolong the lifespan of a vehicle used in limousine service. However, the more cumulative mileage registered on the vehicle's odometer, the greater likelihood of safety risks and issues with the vehicle. *See Keystone Cab*, 54 A.3d 126, 129 (a vehicle's mileage and its reliability and safety is a matter of common sense and practical experience). Furthermore, the Commission does not have the resources to conduct inspections at the frequency required to ensure the ongoing safety of vehicles with high levels of cumulative mileage. While passing an annual state inspection does indicate that the vehicle is safe at the time of the inspection, the Motor Vehicle Code only establishes "minimum standards" for private vehicles and the vehicle at issue could easily deteriorate and become unsafe over the course of that year after the state annual inspection. *See id.* at 128-129.

A few commenters asked the Commission to allow for the "grandfathering" of current vehicles in the carrier's fleet, only requiring the final regulation to apply to vehicles purchased after the effective date of the regulation. *See* South Shore Comments at 2; Mr. Lech Comments at 3. While we are very sensitive to the financial concerns of the carriers, we must strike a balance between the financial needs of the carriers and our public safety obligations to consumers. Accordingly, we have proceeded deliberately with the implementation of this rulemaking, carefully reviewing the public comments in response to our April 5, 2013 Proposed Rulemaking Order before issuing this Final Rulemaking Order. Furthermore, we will delay the effective date of these final-form regulations until six months after the regulations are published in the Pennsylvania Bulletin. We believe this timeframe, as well as our final-form regulation that increased the cumulative mileage limitation to 350,000 miles, is more than sufficient to allow



carriers to prepare and invest accordingly. *See* Annex A.

In asking the Commission to increase the mileage limitation to 350,000 miles, Star Limousine highlighted its plans to use CNG and propane-fueled sedans with longer engine lives. Comments at 2-3. Accordingly, our decision to increase the mileage limitation to 350,000 miles would fulfill Star Limousine's request. Furthermore, as in our above disposition of similar comments regarding AFVs in taxi service, we find that, due to the environmental benefits and economic opportunities, incentivizing the use of AFVs in limousine service is in the public interest. We encourage and expect carriers to use new vehicles in their fleet, similar to the vehicles used by Veterans Taxi.<sup>31</sup> However, older vehicles present other safety considerations, regardless of the type of engine or the expected life of that engine. For example, the safety features of older vehicles become technologically outdated over the course of time. Since we are generously increasing the mileage limitation to 350,000 miles, we find it unnecessary to provide explicit language in our final regulations that exempts AFVs from the mileage limitation in limousine service. If a limousine carrier believes its AFV can still operate safely beyond 350,000 miles, that carrier may file a petition for waiver of Commission regulations under 52 Pa. Code § 5.43 to use that AFV in its fleet.

Consistent with the above discussion, we will adopt the final-form regulations in Annex A that replace the eight-year vehicle age limitation with a 350,000 vehicle mileage limitation. In replacing the age limitation with a mileage limitation, we stress that we will not tolerate carriers who roll back the odometers in an effort to prolong the lifespan of a vehicle beyond 350,000 miles, which is a very reasonable and accommodating standard. A carrier who has unlawfully tampered with an odometer is subject to state and federal liabilities, fines, and potential imprisonment. *See* 49 U.S.C. § 32709 (federal liability); 75 Pa. C.S. § 7138 (Pennsylvania civil and criminal liability); 75 Pa. C.S. § 7139 (Pennsylvania corporate liability).

---

<sup>31</sup> *See* <http://www.startransportationgroup.com/veterans/>.

## CONCLUSION

Upon receiving and analyzing the numerous public comments to the April 5, 2013 Proposed Rulemaking Order at this Docket, the Commission finalizes its regulations at 52 Pa. Code §§ 29.314, 29.333 to balance the needs of consumers and motor carriers for passenger service, to protect the public safety, to further economic development, and to promote new technologies in an environmentally sound manner. We find that elimination of the Commission's vehicle list requirement and vehicle waiver program regarding vehicle age limitations for taxis and limousines is in the public interest and will allow the Commission to more efficiently and effectively use its resources in the regulation of taxis and limousines. We find that implementing a dual age/mileage limitation for taxis at 10 model years or 350,000 miles, whichever comes first, is in the public interest. We find that incentivizing alternative fuel vehicles in taxi service will result in environmental benefits and economic opportunities for the Commonwealth, its citizenry, and its visitors. We also find that replacing the eight year vehicle age limitation with a 350,000 mileage limitation for limousines is in the public interest. Based on the above discussion and disposition, we amend and finalize our regulations, consistent with this Final Rulemaking Order. Accordingly, the Commission formally adopts the final regulations, as set forth in Annex A.

Accordingly, pursuant to Sections 501, 1301, 1501, and 2301 of the Public Utility Code, 66 Pa. C.S. §§ 501 and 1501; Sections 201 and 202 of the Act of July 31, 1968, P.L. 769 No. 240, 45 P.S. §§ 1201-1202, and the regulations promulgated thereunder at 1 Pa. Code §§ 7.1, 7.2, and 7.5; Section 204(b) of the Commonwealth Attorneys Act, 71 P.S. 732.204(b); Section 745.5 of the Regulatory Review Act, 71 P.S. § 745.5; and Section 612 of the Administrative Code of 1929, 71 P.S. § 232, and the regulations promulgated thereunder at 4 Pa. Code §§ 7.231-7.234, we will adopt the final-form regulations set forth in Annex A, attached hereto; **THEREFORE,**

**IT IS ORDERED:**

1. That the Secretary shall serve a copy of this Order and Annex A on all limousine and taxi service industry groups and associations in the Commonwealth and all other parties that filed comments at Docket No. L-2013-2349042, Rulemaking Re Motor Carrier Vehicle List And Vehicle Age Requirements (entered Apr. 5, 2013).

2. That the Secretary shall certify this order and Annex A and deposit them with the Legislative Bureau for publication in the *Pennsylvania Bulletin*.

3. That the Secretary shall submit this order and Annex A to the Office of Attorney General for approval as to legality.

4. That the Secretary shall submit this order and Annex A to the Governor's Office of Budget for review of fiscal impact.

5. That the Secretary shall submit this order and Annex A for review by the designated standing committees of both houses of the General Assembly, and for review and approval by the Independent Regulatory Review Commission.

6. That the final regulations shall become effective six months after publication in the *Pennsylvania Bulletin*.

7. That the contact persons for this Final Rulemaking are Ken Stark, Assistant Counsel, (717) 787-5558 (legal) and Robert Bingaman, Bureau of Technical Utility Services, (717) 787-1168 (technical). Alternate formats of this document are available to persons with disabilities and may be obtained by contacting Sherri Delbiondo, Regulatory Review Assistant, Law Bureau, (717) 772-4597.

**BY THE COMMISSION,**



Rosemary Chiavetta  
Secretary

(SEAL)

ORDER ADOPTED: November 13, 2014

ORDER ENTERED: November 19, 2014

ANNEX A  
TITLE 52. PUBLIC UTILITIES  
PART I. PUBLIC UTILITY COMMISSION  
Subpart B. CARRIERS OF PASSENGERS OR PROPERTY  
CHAPTER 29. MOTOR CARRIERS OF PASSENGERS  
Subchapter D. SUPPLEMENTAL REGULATIONS

CALL OR DEMAND SERVICE

**§ 29.314. Vehicle and equipment requirements.**

\* \* \* \* \*

(c) [*Vehicle list.* Between December 1 and December 31 of each year, carriers shall provide the Commission with a current list of all vehicles utilized under its call or demand authority. The list must contain the year, make, vehicle identification number and registration number for each vehicle. The list shall be mailed to Director, Bureau of Transportation and Safety, Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg, Pennsylvania 17105-3265.

(d) [*Vehicle age AND MILEAGE.* [Unless otherwise permitted by the Commission, a vehicle may not be operated in call and demand service which] A vehicle that is more than 810 model years old OR HAS MORE THAN 350,000 MILES OF CUMULATIVE MILEAGE REGISTERED ON ITS ODOMETER may not be operated in call and demand service. For example, the last day on which a [1996] ~~2014~~2016 model year vehicle may be operated in taxi service is December 31, [2004] ~~2022~~2026. ELECTRIC VEHICLES, HYBRID ELECTRIC VEHICLES, AND VEHICLES UTILIZING ALTERNATIVE FUELS, AS DEFINED IN THE MOTOR VEHICLE CODE AT 75 PA. C.S. § 102 (RELATING TO DEFINITIONS) AND § 9002 (RELATING TO DEFINITIONS), MAY OPERATE IN CALL AND DEMAND SERVICE UNTIL THE VEHICLE AGE OF 12 MODEL YEARS OR THE CUMULATIVE MILEAGE LEVEL OF 350,000 MILES REGISTERED ON THE ODOMETER. FOR EXAMPLE, THE LAST DAY ON WHICH A QUALIFYING MODEL YEAR 2016 ALTERNATIVE FUEL VEHICLE, HYBRID ELECTRIC VEHICLE, OR ELECTRIC VEHICLE MAY BE OPERATED IN TAXI SERVICE IS DECEMBER 31, 2028. This provision is effective 6 MONTHS after [August 6, 2007]\_\_\_\_. (*Editor's Note: the blank refers to the effective date of adoption of this proposed rulemaking.*)

[(e)] (d) \* \* \*

## LIMOUSINE SERVICE

### § 29.333. Vehicle and equipment requirements.

\* \* \* \* \*

(d) [*Vehicle list*. Between December 1 and December 31 of each year, carriers shall provide the Commission with a current list of all vehicles utilized under its limousine authority. The list must contain the year, make, vehicle identification number and registration number for each vehicle. The list shall be mailed to Director, Bureau of Transportation and Safety, Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg, Pennsylvania 17105-3265.

(e) [*Vehicle [age] mileage*. [Unless otherwise permitted by the Commission, a] A vehicle with more than 350,000~~200,000~~ miles of cumulative mileage registered on its odometer may not be operated in limousine service[ which is more than 8 model years old. For example, the last day on which a 1996 model year vehicle may be operated in limousine service is December 31, 2004]. This provision is effective 6 MONTHS [August 6, 2007] after \_\_\_\_\_. (*Editor's Note: the blank refers to the effective date of adoption of this proposed rulemaking*).

BRAD GORDESKY  
JETWAY TRANSPORT INC  
908 DEKALB STREET  
BRIDGEPORT PA 19405

JIM SALINGER PRES  
UNIQUE LIMOUSINE  
1900 CROOKED HILL RD  
P O BOX 60264  
HBG PA 17106-0264

ANTHONY AZARA VP  
CITY CAR SVCS OF NJ LLC  
461 SOUTHARD ST  
TRENTON NJ 08638

ROBERT JAMES MUIR  
INFINITY LIMOUSINE  
2619 LEISCZS BRIDGE RD  
SUITE 100  
LEESPORT PA 19533

HONORABLE TIM KRIEGER  
HOUSE OF REPRESENTATIVES  
101 EHALT ST SUITE 105  
GREENSBURG PA 15601

RAY JAKLITSCH CEO  
CLASSIC BRITISH LIMO SERVICE  
435 WINDING STREAM ROAD  
SPRING CITY PA 19475

JOSEPH MARTINO  
FANTASY LIMOUSINE SVC  
1155 SKYLINE DRIVE  
GREENSBURG PA 15601

GREGORY RUFFO  
RUFFO'S AUTO REPAIR  
401 NORTH 4<sup>TH</sup> ST  
YOUNGWOOD PA 15697

DONNA GRODIS  
PARRISH TRANSPORTATION  
1095 PITTSTON BY PASS  
JENKINS TWP PA 18640

SUZANNE PELTON  
A-1 ALTOONA TAXI  
217 E 6TH AVENUE  
ALTOONA PA 16602-2749

STEVE RHOADS PRES  
RHOADS LIMOUSINE SVC INC  
96 WEAVERTOWN LANE  
DOUGLASSVILLE PA 19518

PATRICK EVANS PRES  
AA TAXI INC  
220 B REESE RD  
STATE COLLEGE PA 16801

JEFFREY SHANKER EXEC VP  
A-1 LIMOUSINE  
2 EMMONS DRIVE  
PRINCETON NJ 08540

CHRISTOPHER HAINES PRES  
HAINES TRANSPORTATION  
SVCS INC  
3501 A POTTSVILLE PIKE  
READING PA 19605

JAMES A PETRILI OWNER  
RELIABLE LIMOUSINE SVC  
235 E BROAD STREET  
HAZLETON PA 18201

ANTHONY KILIANY  
WHITE KNIGHT LIMOUSINE  
1807 W LOUCKS EXT  
SCOTTDAL PA 15683

JAMES DANIELEWICZ  
JOY DANIELEWICZ-BRITTON  
LIMOUSINES FOR LESS INC  
2 EMMONS DRIVE  
PRINCETON NJ 08540

MEL MARROLI  
A. ROYAL LIMOUSINE LLC  
1820 CANAL LANE  
P O BOX 137  
UPPER BLACK EDDY PA 18972

MARK J MCENERY PRES  
SOUTH SHORE LIMOUSINE  
2501 W 12<sup>TH</sup> ST  
SUITE 369  
ERIE PA 16505

BARNETT SATINSKY ESQ  
FOX ROTHSCHILD LLP  
2000 MARKET ST 20<sup>TH</sup> FL  
PHILADELPHIA PA 19103-3222

CRAIG A DOLL ESQ  
25 WEST SECOND STREET  
P O BOX 403 HUMMELSTOWN  
PA 17036-0403

HON THOMAS MURT  
HOUSE OF REP 152<sup>ND</sup> DIST  
P O BOX 202152  
HARRISBURG PA 17120-2152

WILLIAM A GRAY ESQ  
VUONO & GRAY LLC  
310 GRANT ST SUITE 2310  
PITTSBURGH PA 15219-2383

DAVID M O'BOYLE ESQ  
WICK STREIFF MEYER O'BOYLE  
& SZELIGO PC  
1450 2 CHATHAM CNTR  
112 WASHINGTON PLACE  
PITTSBURGH PA 15219-3455

MICHAEL SULLIVAN  
CENTRAL PA TAXICAB ASSOC  
2304 WALNUT ST  
HARRISBURG PA 17103

MARK J MCENERY PRES  
ERIE TRANSPORTATION SVCS  
129 E 26<sup>TH</sup> STREET  
ERIE PA 16504

MARK J MCENERY PRES  
METRO TRANSPORTATION OF  
PA LLC  
2501 W 12<sup>TH</sup> ST SUITE 369  
ERIE PA 16505





COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
400 NORTH STREET  
HARRISBURG, PA 17120

ROBERT F. POWELSON  
CHAIRMAN

February 27, 2015

The Honorable John F. Mizner  
Chairman, Independent Regulatory Review Commission  
14th Floor, Harristown II  
333 Market Street  
Harrisburg, PA 17101

**Re: L-2013-2349042/57-296; Re Motor Carrier Vehicle List and Vehicle Age Requirements  
52 Pa. Code, Chapter 29**

Dear Chairman Mizner:

Enclosed please find one copy of the regulatory documents concerning the above-captioned rulemaking. Under Section 745.5(a) of the Regulatory Review Act, the Act of June 30, 1989 (P.L. 73, No. 19) (71 P.S. §§745.1-745.15) the Commission, on October 3, 2013, submitted a copy of the Notice of Proposed Rulemaking to the Senate Committee on Consumer Protection and Professional Licensure, the House Consumer Affairs Committee and the Independent Regulatory Review Commission (IRRC). This notice was published at 43 *Pa.B.* 6203 on, October 19, 2013. The Commission also provided the Committees and IRRC with copies of all comments received in compliance with Section 745.5(b.1).

In preparing this final form rulemaking, the Commission has considered all comments received from the Committees, IRRC and the public.

Sincerely,

A handwritten signature in black ink that reads "Rob Powelson".

Robert F. Powelson

Enclosures

cc: The Honorable Robert M. Tomlinson  
The Honorable Lisa Boscola  
The Honorable Robert Godshall  
The Honorable Peter J. Daley, II  
Legislative Affairs Director Perry  
Chief Counsel Pankiw  
Assistant Counsel Stark  
Regulatory Coordinator DelBiondo

TRANSMITTAL SHEET FOR REGULATIONS SUBJECT  
TO THE REGULATORY REVIEW ACT

ID Number: L-2013-2349042/57-296

Subject: Proposed Rulemaking Re Motor Carrier Vehicle List and  
Vehicle Age Requirements

Pennsylvania Public Utility Commission

2015 FEB 27 AM 10:32

RECEIVED  
IRRC

TYPE OF REGULATION

- \_\_\_\_\_ Proposed Regulation
- \_\_\_\_\_ Final Regulation with Notice of Proposed Rulemaking Omitted.
- X   Final Regulation
- \_\_\_\_\_ 120-day Emergency Certification of the Attorney General
- \_\_\_\_\_ 120-day Emergency Certification of the Governor

FILING OF REPORT

Date

Signature

Designation

2/27/15 Stuyvesant

HOUSE COMMITTEE (Godshall)  
Consumer Affairs

2/27/15 T. Blumenthal

SENATE COMMITTEE (Tomlinson)  
Consumer Protection and  
Professional Licensure

2/27/15 K. Cooper

Independent Regulatory  
Review Commission

\_\_\_\_\_

Attorney General

\_\_\_\_\_

Legislative Reference Bureau