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MCNAUGHTON BROS. INC.

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December 6, 2013

Office of the Secretary of the Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

To the Commission:

I write in regards to the proposed rulemaking recently published in the Pennsylvania Bulletin. Specifically, I am referring to ANNEX A Subchapter F. MOTOR TRANSPORTATION PROCEEDINGS.

Limiting challenges to 'fitness only' will require substantial review and analysis to determine exactly what the criteria will be for technical and financial abilities. How is the PUC going to quantify 'a propensity to operate safely and legally'? Existing carriers have established/demonstrated what their propensities are. PAPUC records as well as those of the FMCSA provide it. Furthermore, existing carriers have made significant investment in acquiring the authority(ies) that enable us to have done so. To summarily disregard those efforts and costs seems inconsiderate at best.

About 'verified statements of supporting parties' no longer being required I believe that the cart has been put ahead of the proverbial horse. Does not the commission KNOW if significant demand has been received for more service providers? If no such demand is present the commission could simply and unilaterally reject applications.

Finally, the specter of granting household goods authority to applicants who do not have a physical presence in the Commonwealth is philosophically abhorrent and operationally deficient and probably will be costly to those who provide the commission its revenue. Would it not be ironic if these proposals are brought to fruition and present carriers bear the brunt of new costs? I envision those new costs being increased man hours to perform fitness reviews, travel expenses to perform safety fitness reviews at the new movers' out-of-state locations and increased administrative time providing 'sufficient' records. All certificated carriers should have real, physical presence in the Commonwealth! Governor Corbett just signed tax legislation which, in part, tightens the Delaware loophole. The Governor has made a commitment to leveling the playing field while you are proposing to tilt it.

There are many more points in the proposal with which I disagree but I choose to be mindful of your time constraints. The three above are, to me, the most salient. I respectfully ask that the commission's rule making proposal be given every opportunity for public discussion, revision and/or withdrawal.

Sincerely,

Robert A Shively, President
McNaughton Bros, Inc. A00082096



Agent for Allied Van Lines

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