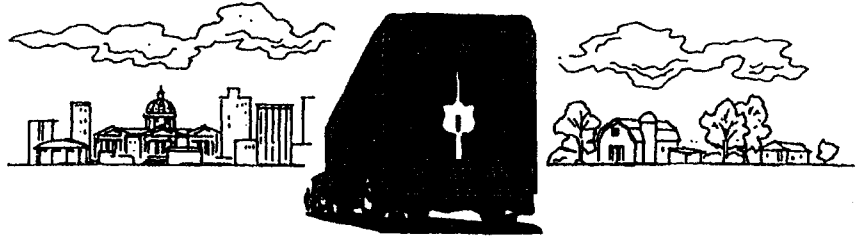


M. F. ROCKEY MOVING CO.

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(SUBURB OF HARRISBURG)
PHONE (717) 932-4906 • FAX (717) 932-4920
FID# 23-1596107



Since 1923

3041

December 11, 2013

Secretary of the Pennsylvania Public Utility Commission

P.O. Box 3265

Harrisburg, Pennsylvania 17105-3265

RE: Comments to PA Bulletin, Doc.No.13-2191 Proposed Rulemaking....

Dear Commissioners:

I feel the Commission should make every effort to consider the effect that any new carrier(s) will have on existing carriers, and the moving public.

I feel, giving existing household goods carriers, statewide authority, regardless of their jurisdictional operating authority, is prejudice and unfair. With the stroke of a pen, it wipes out the untold value of operating authority, certificated carriers have built up, fought to retain, and protect for years, and years, and years. Many of the 278 certificated carriers, today, are Mom and Pop organizations that have been handed down from their previous generations, and most likely will be handed on today....These owners have relied on "sweat equity" and "goodwill" they have built up, to secure loans, negotiate values of their assets and plan for the future of their companies. All directly related to the above, and their PUC operating authority scope...Each PUC operating authority is different, and cover many different scopes of operation. Each city, town, or area has unique value, depending on the reputations, level of service and quality of service provided to the moving public, by the present certificated carriers.....

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WORLD-WIDE SERVICE

Allowing every existing carrier "statewide authority", enhances some carriers, while it diminishes others. For example, take a carrier that has invested hundreds of thousands of dollars, for say, 50 mile authority, versus a smaller carrier with 10 mile authority, which required a much smaller investment...How is it fair to declare, "Okay, now you both have "statewide authority". This seems to be a redistribution of value, in an unfair manner. Not to mention, the untold amount of investments these companies have spent over the years to protect their interests, against outside competition and/or carriers without the proper operating authority. You cannot begin to put a dollar amount on it.

Now on to, any carrier given rights to operate in the Commonwealth of Pennsylvania must be required to have a physical location, within Pennsylvania, and staffed. Given the history of what existing carriers have invested, to secure, maintain and protect their operating authorities. Much consideration should be given as to the cost of operating authority would be for any new carrier being considered. The cost should be substantial. Whereas, it would be more economical to purchase existing operating authority, from current certificated carriers, should there be some looking to transfer their operations.

Lastly, Rogue operators should be charged with fines large enough, to deter the continuation of the underground economy....Too many times these guys are caught, slapped on the wrist and the next thing you know, they are advertising on the internet and right back out there illegally taking business from the legitimate carriers.....They are not paying taxes, they are not paying into the Workers Compensation Fund....and a lot of them are coming into Pennsylvania, from the listed border states, for a days work and running back across the State lines....This is not competition.....this is stealing our business....and stealing revenue from Pennsylvania. Think about this, drivers can be subject to a fine of \$10,000.00 for texting on their phones, while driving.....pretty stiff, compared to operating in Pennsylvania without operating authority....

Pennsylvania is not like the surrounding states.....we have established moving companies, with Pennsylvania PUC certificated authority, and are much more reliable to provide service to the moving public. More so, than some newer,

startup companies, with lesser verifiable service records....We follow the rules...we pay our PUC assessments. We report the required information. We have brick and mortar locations, for our businesses, in the Commonwealth. We pay Pennsylvania taxes. We hire Pennsylvania residents....who pay taxes to the Commonwealth....and contribute to the local economy.....We have you folks working with us.....Pennsylvania is a great state.....with 278 Certificated carriers that can provide the answers you folks are striving to come up with....Start with the building blocks you have, to achieve what you are trying to build...

Respectfully submitted,



Gary L. Henline, General Manger.

M.F. Rockey Moving Co.....PUC #A87455

✓ CC: IRRC..Chairman Silvan B. Lutkewitte III...333 Market Street, 14th Floor,
Harrisburg Pa. 17101