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March 23, 2016

Re: Cranberry Taxi, Inc. d/b/a Veterans Taxi and Cranberry-X
Air Star Transportation & Limousine Service
Classy Cab Company
Star Limousine Service, Inc.
Proposed Rulemaking Order
Docket No. L-2015-2507592
Our Files: 4978, 3554, 5119 and 5224

2016 MAR 29 PM 4: 07

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

MAILED WITH U.S. POSTAL SERVICE
CERTIFICATE OF MAILING FORM 3817

Dear Ms. Chiavetta:

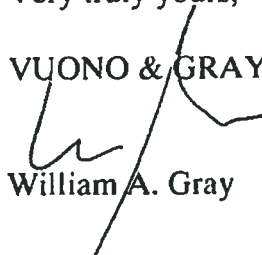
We enclose for filing with the Commission the signed original of the Comments of Cranberry Taxi, Inc. d/b/a Veterans Taxi and Cranberry-X, Air Star Transportation & Limousine Service, Classy Cab Company, and Star Limousine Service, Inc. in opposition to the Proposed Rulemaking Order at Docket No. L-2015-2507592.

Please acknowledge receipt and filing of the enclosed on the duplicate copy of this letter of transmittal and return it to the undersigned in the self-addressed, stamped envelope provided.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray



PA P.U.C.
SECRETARY'S BUREAU

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Enclosures

cc: Mr. Derek DeLucia (w/enc.)

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2016 MAR 29 PM 4: 07

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RE: PROPOSED RULEMAKING ORDER
DOCKET NO. L-2015-2507592

COMMENTS OF DEREK DELUCIA
ON BEHALF OF CRANBERRY TAXI, INC. D/B/A/ VETERANS TAXI AND
CRANBERRY-X, CLASSY CAB COMPANY, STAR LIMOUSINE SERVICE AND AIR
STAR TRANSPORTATION & LIMOUSINE SERVICE, INC.
IN OPPOSITION TO
PROPOSED RULEMAKING ORDER

The Commission published in the Pennsylvania Bulletin dated February 27, 2016, a proposed rulemaking order to amend existing regulations governing passenger motor carriers to eliminate public demand or need for the requirement.

Cranberry Taxi, Inc. d/b/a Veterans Taxi and Cranberry-X ("Cranberry"), Classy Cab Company ("Classy Cab") Star Limousine Service, Inc. ("Star Limousine") and Air Star Transportation & Limousine Service ("Air Star") object to the proposal to eliminate the requirements that applicants for authority establish a public demand or need for the proposed service.

The business address of Cranberry, Classy Cab, Star Limousine and Air Star is 8541 Peters Road, Unit 2, Cranberry Township, PA 16066. Cranberry has authority at Docket No. A-00119935 authorizing it to provide call or demand and paratransit service in and from the Counties of Allegheny, Beaver and Butler. Cranberry has provided service under its PUC authority on a regular, continuing basis since it was first certificated on December 8, 2003.

Classy Cab has authority at Docket No. A-00121579 authorizing it to provide call or demand and paratransit service in and from the Counties of Allegheny, Beaver, Butler, Fayette, Lawrence and Washington. Classy Cab has provided service under its PUC authority on a regular, continuing basis since it was first certificated on September 9, 2005. Star Limousine has authority at Docket No. A-00106305 authorizing it to provide airport transfer service from points in Butler County to various named airports located in western Pennsylvania. Star Limousine has provided service under its PUC authority on a regular, continuing basis since it was first granted authority in 1985. Air Star has authority at Docket No. A-00123147 authorizing it to provide paratransit and group and party (11-15) service from the Counties of Allegheny, Butler, Beaver, Fayette, Lawrence and Washington to points in Pennsylvania. Air Star has provided service under its PUC authority on a regular, continuing basis since it was first certificated on May 25, 2007.

As will be discussed below, Cranberry, Classy Cab, Star Limousine and Air Star believe that the Commission should continue to handle passenger applications in the same manner that it has handled such applications in the past and continues to handle such applications at the present time.

Cranberry, Classy Cab, Star Limousine and Air Star believe that there is a need to regulate the number of companies that can provide passenger transportation service in Pennsylvania and, in particular, in the territory which Cranberry, Classy Cab, Star Limousine and Air Star are authorized to serve. If the public demand/need standard is eliminated, the obvious result will be that anyone that wants to secure passenger authority will be able to secure such authority. There is already substantial competition in this industry and the addition of new companies in the industry may cause existing companies to go out of business.

Most passenger carriers in this area are small operators who have built their business on providing local service to the public. The addition of the new competition that will result will have a negative financial effect on these companies which will far outweigh any benefit to the public. Existing companies, including the parties filing these comments, have invested significant time and financial resources to provide the service required by the public.

Cranberry, Classy Cab, Star Limousine and Air Star have made a substantial investment in their operating authority and equipment. This investment will be substantially in jeopardy if the proposed changes are put into effect.

For all of the above reasons, Cranberry, Classy Cab, Star Limousine and Air Star oppose the proposed change set forth in the Pennsylvania Bulletin dated February 27, 2016.

Respectfully submitted,

VUONO & GRAY/LLC

By: 

William A. Gray, Esq.

Attorneys for

Cranberry Taxi, Inc. d/b/a Veterans Taxi and Cranberry-X

Classy Cab Company, Inc.

Star Limousine Service, Inc.


Air Star Transportation & Limousine Service, Inc.

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VERIFICATION

I verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Dated: 3/23/16



Derek A. DeLuca, President
Cranberry Taxi, Inc. d/b/a Veterans Taxi and Cranberry-X
Classy Cab Company, Inc.
Star Limousine Service, Inc.
Air Star Transportation & Limousine Service, Inc.

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