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March 23, 2016

Re: Ford City Hose Company #1 Ambulance Service
Proposed Rulemaking Order
Docket No. L-2015-2507592
Our File: 4759

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IRRC

2016 MAR 29 PM 4:07

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:

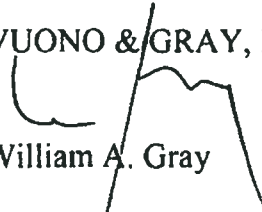
We enclose for filing with the Commission the signed original of the Comments of Ford City Hose Company #1 Ambulance Service in opposition to the Proposed Rulemaking Order at Docket No. L-2015-2507592.

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



mm/161696

Enclosures

cc: Ford City Hose Company #1 Ambulance Service (w/enc.)

PA P.U.C.
SECRETARY'S BUREAU

2016 MAR 23 AM 10:26
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Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2016 MAR 29 PM 4: 07

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

2016 MAR 25 AM 10: 26
PA P.U.C.
SECRETARY'S BUREAU

RECEIVED

COMMENTS OF DAVID P. DUNMIRE
ON BEHALF OF FORD CITY HOSE COMPANY #1
AMBULANCE SERVICE, INC. t/d/b/a CARE-VAN
IN OPPOSITION TO
PROPOSED RULEMAKING ORDER

The Commission published in the Pennsylvania Bulletin dated February 27, 2016, a proposed rulemaking order to amend the existing regulations governing passenger motor carriers to eliminate the public demand or need requirement for applications for authority. Ford City Hose Company #1 Ambulance Service, Inc. t/d/b/a Care-Van ("Ford City Ambulance") objects to the proposal to eliminate this requirement.

The business address of Ford City Ambulance is 412 10th Street, P.O. Box 447, Ford City, PA 16226. Ford City Ambulance has authority at Docket No. A-00117373 authorizing it to provide paratransit service from points in Armstrong County to points in Pennsylvania. Ford City Ambulance has provided service under its PUC authority on a regular, continuing basis since it was first certificated on February 19, 2002.

As will be discussed below, Ford City Ambulance believes that the Commission should continue to handle paratransit applications in the same manner that it has handled such applications in the past and continues to handle such applications at the present time.

Ford City Ambulance firmly believes that there is a need to regulate the number of paratransit companies that can provide service in Pennsylvania and, in particular, in the territory which Ford City Ambulance is authorized to serve. If the public demand/need requirement is eliminated, the obvious result will be that anyone that wants to secure paratransit 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 of the paratransit service providers in our 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 have invested significant time and financial resources to provide the service required by the public.

Ford City Ambulance has made a substantial investment in its operating authority and in its equipment. This investment will be substantially in jeopardy if the proposed changes are put into effect.

For all of the above reasons, Ford City Hose Company #1 Ambulance Service t/d/b/a Care-Van opposes 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
Ford City Hose Company #1
Ambulance Service, Inc. t/d/b/a
Care-Van

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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.


David P. Dunmire, Director

Dated: 3-27-14