



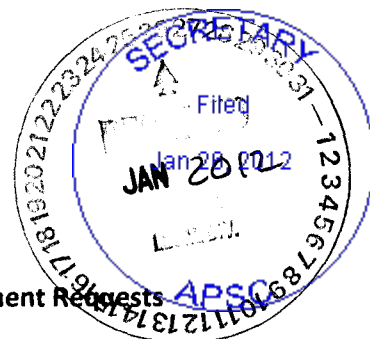
Wheelchair Shuttle by
Wheelchair Transportation & Taxi Cab Services, LLC
P.O. Box 483, Florence, AL 35631
256.766.RIDE

info@WheelChairShuttle.com

WheelChairShuttle.com

January 23, 2012,

Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
P.O. Box 304260
Montgomery, AL 36130-4260



RE: Application of Carbine Enterprises, INC. Docket 31772(Y) AND Document Requests

Dear Mr. Thomas:

Please accept this letter as notice that Wheelchair Transportation and Taxi Cab Services, LLC will appear and protest the above referenced application submitted on behalf of **Carbine Enterprises, INC.**, an Alabama corporation, **d/b/a QUAD CITIES TAXI & LIMOUSINE**, which seeks to **EXTEND** an existing operation under Motor Carrier Certificate of Public Convenience and Necessity 3941 by removing the current restriction in said authority which precludes the transportation of nonemergency medical patients as a common carrier by motor vehicle in intrastate commerce over **IRREGULAR ROUTES** in the transportation of: Passengers and their baggage in special or charter taxi operations over irregular routes as follows: (1) Between all points and places in Colbert and Lauderdale Counties; and (2) From all points in (1) above to all points in Alabama and return. **RESTRICTION:** Restricted against the transportation of nonemergency medical patients.

Wheelchair Transportation and Taxi Cab Services, LLC will holds authority from the Alabama Public Service Commission (the "Commission") pursuant to Certificate 3979 and NPV A-69 as a common carrier in the intrastate transportation of:

Passengers and their baggage in special or charter taxi operations over irregular routes as follows:

- (1) Between all points in the counties of Lauderdale, Colbert and Franklin; and
- (2) From all points in Lauderdale, Colbert and Franklin Counties to all points in Alabama; and
- (3) From all points in Alabama to all points in Lauderdale, Colbert and Franklin Counties.

Wheelchair Transportation and Taxi Cab Services, LLC denies that the proposed operation to be provided by **Carbine Enterprises INC.** is superior to those existing and asserts that the proposed services will serve no useful purpose which has not or cannot be met by existing companies. The proposed area will overlap into areas already receiving service from existing companies, such as

Wheelchair Transportation and Taxi Cab Services, LLC; thus, the proposed operations are inconsistent with the public interest, will unnecessarily duplicate the existing operations of Wheelchair Transportation and Taxi Cab Services, LLC and will materially depreciate the ability of Wheelchair Transportation and Taxi Cab Services, LLC to serve the public in these areas.

We further assert that **Carbine Enterprises, INC., d/b/a QUAD CITIES TAXI & LIMOUSINE** is not fit, under its current CON has and does not follow the Commission's rules and is under investigation by the Commission's Enforcement Division for multiply rule, tariff and authority restriction offenses.

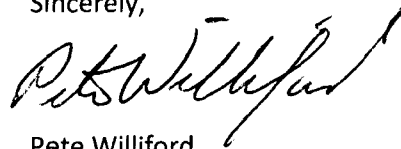
PROTESTANT REQUEST:

To assist and give evidence in our protest, Wheelchair Transportation and Taxi Cab Services, LLC, requests the presence and testimony of APSC Transportation Officer Lt. Leo Sauls, JR with all investigative files, records and notes pertaining to the applicant. We also request that copies of ALL the applicants Insurance filings and any other documents pertaining to Insurance with the commission for the years of 2009, 2010, 2011 and 2012. We also request that the commission request from the applicants current insurance provider (if any) a duplicate original of the applicants current insurance policies and all endorsements thereon.

Wheelchair Transportation and Taxi Cab Services, LLC will appear at the setting of this application on February 2, 2012 to oppose the application.

Please contact me should you require more information regarding this matter. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Williford", with a stylized flourish at the end.

Pete Williford

Member/Manager

CC: James Carbine

EP14F



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