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BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

A1011016

In the Matter of the Application of Open )  
Top Sightseeing Los Angeles, LLC, a )  
Delaware limited liability company, for a )  
Certificate of Public Convenience and )  
Necessity to Operate as Passenger Stage )  
Corporation providing Scheduled Service )  
Between Points in Los Angeles County )  
and to Establish a Zone of Rate Freedom )  
for the Provision of such service. )  
\_\_\_\_\_ )

**A.**

**APPLICATION FOR AUTHORITY TO  
PROVIDE SCHEDULED SERVICE AND  
TO ESTABLISH A ZONE OF RATE FREEDOM**

William D. Taylor, Esq.  
HANSON BRIDGETT LLP  
500 Capitol Mall, Suite 1500  
Sacramento, CA 95814  
Telephone: (916) 442-3333  
Facsimile: (916) 442-2348  
E-mail: [wtaylor@hansonbridgett.com](mailto:wtaylor@hansonbridgett.com)

Attorneys for Open Top Sightseeing  
Los Angeles, LLC

Dated: November 23, 2010



Open Top Sightseeing Los Angeles, LLC  
c/o Anders Nielsen, President  
5500 Tuxedo Road  
Hyattsville, Maryland 20781

Applicant is a Delaware limited liability company. A certified copy of Applicant's Certificate of Good Standing issued by the Delaware Secretary of State is attached hereto as **Exhibit 1**. Applicant is qualified to do business in California (ID #201025810011). A certified copy of Applicant's Certificate of Registration and its current status with the California Secretary of State is attached hereto as **Exhibit 2**.

**II. CORRESPONDENCE AND COMMUNICATIONS (RULE 2.1(B)).**

All correspondence and communications with respect to this Application should be directed to counsel:

William D. Taylor, Esq.  
HANSON BRIDGETT LLP  
500 Capitol Mall, Suite 1500  
Sacramento, CA 95814  
Telephone: (916) 442-3333  
E-mail: wtaylor@hansonbridgett.com

and to its President:

Anders Nielsen, President  
Open Top Sightseeing Los Angeles, LLC  
5500 Tuxedo Road  
Hyattsville, MD 20781  
Telephone: (202) 476-0777  
E-mail: anders@opentopsightseeing.com

**III. FINANCIAL INFORMATION (RULES 2.3 & 3.3(A)(9)).**

A true and correct copy of Applicant's pro forma financial statement based on the business plan developed for the proposed service is attached hereto as **Exhibit 3**. Again, as a newly-formed company, Applicant is supported by the experience and resources of its Managing Member who has considerable and successful experience in the specialized "open top" industry which will serve as a platform for Applicant's strategic model to bring the same expertise and service to passengers in Los Angeles County.

#### IV. SCOPING INFORMATION (RULE 2.1(C)).

##### A. Proposed Category.

Applicant proposes that the California Public Utilities Commission ("Commission" or "PUC") classify this proceeding as ratesetting. Although the certification aspects of this Application do not affect rates, the definitions of "adjudicatory" or "quasi-legislative" as set forth in Rule 1.3(a) and (d) clearly do not apply to this petition. Rule 7.1(e)(2) specifies that when a proceeding does not clearly fit any of the categories, it should be conducted under the ratesetting procedures.

##### B. Need for Hearing.

Consistent with the Commission's policy of promoting competition,<sup>2</sup> in this proceeding there is no need for a public hearing in order for the Commission to act on this Application. Applicant's financial and operational fitness to provide the proposed service are beyond dispute. Moreover, the service to be provided is recreational in nature and would not be employed for commute or other essential purposes.

##### C. Issues to Be Considered.

The sole issues in this proceeding are: (1) whether Applicant possesses the requisite managerial, financial, and technical qualifications to provide the limited scheduled service described herein - services incidental to Applicant's primary business activity - the offering of sightseeing tour; and, (2) whether granting this Application is otherwise consistent with the public interest.

##### D. Proposed Schedule.

Applicant proposes the following schedule:

December 15, 2010 - Final date for protests; application deemed submitted

January 15, 2011 - Commission decision issued granting application

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<sup>2</sup> *American Buslines, Inc.*, 3 CPUC 2d 246 (1980).

Applicant acknowledges that it has proposed a schedule where very little time is provided between the close of the protest period and the issuance of a Commission decision granting the instant application commence during the protest period. Applicant respectfully requests that the Application be approved as soon as possible so that the authority sought will be provided prior to the winter holidays when many visitors travel to the proposed service territory for a seasonal vacation or to attend year-end events throughout the area.

**V. THE SPECIFIC AUTHORITY REQUESTED (RULE 3.3(A)(2)).**

As an extension of the other commonly-owned "Open Top" operations, Applicant brings to the County of Los Angeles the benefit of a proven management dedicated to "Hop On/Hop Off" services to meet the needs of tourists who want a flexible schedule to visit the many sites within the County of Los Angeles at their own pace and leisure. Fares will be assessed on a per passenger basis with multi-day tickets which allow a passenger the convenience of using the service as his or her travel schedule requires. It is expected that the overwhelming majority of Applicant's passengers will board Applicant's buses and take advantage of the "Hop On/Hop Off" feature not otherwise available under a charter-party authority which is limited to round-trip, loop sightseeing trips that do not provide the flexibility to board or depart from the vehicle by virtue of the PSC sought herein. Accordingly, and in order to operate a service more attuned to the travel needs of its target market, Applicant seeks the PSC described herein.

As more fully set forth below, Applicant will initiate a tour schedule within Los Angeles County, at fares for passengers permitting them to exit and reboard Applicant's buses as they please. Following the approval of this Application, Applicant will file a service tariff and timetable with the Commission.

**VI. GEOGRAPHICAL SCOPE (RULE 3.3(A)(4)(5)).**

The proposed service will be provided to visit at the major tourist venues within the County of Los Angeles. The geographical scope of the Application is depicted in **Exhibit 4**. The routes will not utilize public transit bus stops, but will instead utilize parking white zones that were already in existence or established in cooperation with the County's Metropolitan

Transportation District. The specific destination sites within Los Angeles County include: the City of Los Angeles from Downtown to the beaches of Santa Monica, with stops in such legendary streets and places as: the Grammy Museum; Los Angeles Theatre; Fashion District; Central Library; Little Tokyo; Union Station; China Town; Civic Center; Walt Disney Concert Hall; Main Street at Santa Monica; Santa Monica College; Annenberg Museum; Santa Monica Boulevard; Beverly Hills; Wilshire Boulevard; Hammer Museum; Santa Monica Pier; Aquarium; Kodak Theatre; Pantages Theatre; Hard Rock Café; Rodeo Drive; La Brea Tar Pits; Olivera Street, Music Center; Paramount Studios; Farmers Market; Sunset Strip; and, Universal Studios, as well as, the many hotels along the route, consisting of at least three separately identified routes as described in Applicant's tariff to be filed upon approval of the Application.<sup>3</sup>

**VII. RATES.**

**A. Base Rate.**

Applicant proposes to charge the following fares for each passenger:

<b>TOUR</b>	<b>ADULT FARE</b>	<b>CHILD FARE</b>
Two Day Ticket One Route:	\$35.00	\$18.00
Five Day Ticket One Route:	\$60.00	\$30.00
Add Second Route Two Days:	\$10.00	\$5.00
Add Second Route Five Days:	\$15.00	\$8.00
All routes 2 Days:	\$55.00	\$28
All routes; 5 Days:	\$85.00	\$43.00
Night Tour	\$39.00	\$20.00

<sup>3</sup> For purposes of this Application, a proposed tariff is not required. Rule 3.3(a)(6).

**B. Zone of Rate Freedom (ZORF).**

Applicant seeks to establish a ZORF of plus or minus \$10 around the proposed rates, i.e. for a regular passenger fare of \$35.00, the ZORF would be \$25.00. This range is consistent with that sought and obtained by carriers in the airport ground transportation market. A ZORF will permit Applicant to adjust rates to meet uncertain market conditions in the future without having to repeatedly return to the Commission for rate relief.

Tours within the Los Angeles market are highly competitive. Applicant's London-style coaches represent another meaningful service option to tourists, backed by a proven record to operate such specialized operators and vehicles by common management and control. Applicant will compete with other PSCs, taxicabs, limousines, public transit and automobiles in its service area. This highly customer environment will result in Applicant's rates within the ZORF being set at a reasonable level by comparison to other forms of transportation available to the tourists.

Moreover, Applicant will also face competition from sources other than existing transportation providers. Put another way, everyone has to be able to make telephone calls and everyone flying into or out of LAX has to be able to get to and from the airport, but no one is forced to take a tour. This is an option to enhance the Los Angeles experience. Applicant should, therefore, be afforded the broadest possible rate flexibility in order to compete with them.

**VIII. FREQUENCY OF SERVICE (RULE 3.3(A)(7)).**

Applicant will operate on a minimum turn-around schedule of its vehicles with the 30-minutes between the first departure at Stop 1, near the Information Center at Hollywood Boulevard. The first departure time is 9 a.m.

**IX. EQUIPMENT (RULE 3.3(A)(8)).**

Applicant will operate up to 10 new Double-Decker buses to provide the service. The Double Decker buses are buses custom built for the American market pursuant to FMCSA regulations. Each unit will have been inspected and approved for use by the California

Department of motor Vehicles ("DMV") and the California Highway Patrol ("CHP"). Each vehicle accommodates approximately 80 passengers. All of the buses meet the latest American emission standards, utilizing EPA07 engines.

X. **DRIVERS.**

Consistent with the practices related to drivers employed in the open top operations of affiliated carriers, Applicant will retain employees who are fully trained to operate its specialized buses, including compliance with all applicable federal and state requirements for such operators of passenger vehicles. The drivers are subject to strict and mandatory drug testing and abuse testing and compliance mandates. Applicant will conduct continuous driver and safety training programs.

XI. **FURTHER SUPPORT FOR APPLICANT.**

A. **Insurance.**

Applicant will participate in the same insurance program currently available to the Open Top subsidiaries owned by Managing Member.

B. **Fitness.**

As a newly-formed entity, Applicant does not have its own fitness profile. However, by virtue of its connection with the parent company, Applicant will be managed from a full and complete safety perspective.

C. **Preventative Maintenance Program.**

Applicant will make available a full maintenance program to assure safe and reliable equipment to protect both customers and the general public. Prior practice in connection with current operations by affiliated companies will serve as a model for Applicant to meet these standards.

D. **Compliance with Hours of Service.**

All drivers will be instructed in and will be monitored to assure compliance with applicable hours of service.

**XII. REASONS FOR INITIATION OF PROPOSED SERVICE (RULE 3.3(A)(10)).**

Normally, typical round-trip tour service would not require a PSC. As set forth above, however, the desires of passengers to visit points of interest along the routes of service at their own leisure lead Applicant to seek PSC authority as an appropriate license to legally meet an operate contemplated service. Remitting Applicant to offer scheduled service will allow competition between other transportation providers, respond to the needs of its customers, and, in general, provide better and more efficient service to the public.

**XIII. CEQA COMPLIANCE (RULE 2.4).**

As the lead or responsible agency for making determination on matters that can be construed as "projects" under CEQA, Pub.Res.Code §21000 et seq. the Commission must satisfy the requirements of CEQA under Rule 2.4 of the commission's Rules of Practice and Procedure. CEQA compliance may be demonstrated by a finding that it can be seen with certainty that there is no possibility the project in question may have a significant adverse effect on the environment.<sup>4</sup> This is such a case.

The service will contribute positively to the environment by providing an alternative means of group transportation to the points along the route thereby removing single passenger or limousine traffic from the routes described herein. The reduction in such traffic will reduce both noise and exhaust fume pollution, which would otherwise impact the streets, residents, and businesses of the affected localities. Finally, all of Applicant's double-decker buses use biodiesel fuel so Applicant is also making an active effort to reduce its carbon footprint.

Therefore, it can be seen with certainty that there is no possibility the service in question may have a significant adverse effect on the environment. This is the same conclusion that the Commission typically reaches with respect to applications for new scheduled authority that do not involve the construction of facilities. *Samho Tour, Inc.*, Decision 09-07-044; *the Wine Line, LLC*, Decision 09-02-012; *Affordable Airport Shuttle, LLC*, Decision 08-12-012.

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<sup>4</sup> See *Catalina Freight Lines, Inc.*, D.07-01-006 (Jan. 11, 2007).

**XIV. EXPEDITED EX PARTE RELIEF.**

Applicant requests that this Application be granted on an expedited, *ex parte* basis. Given that: (1) this Applicant is consistent with the Commission's policy in favor of open market entry and competition in the provision of passenger transportation services; and, (2) Applicant's financial and operational fitness to provide the proposed scheduled service, Applicant is unaware of any basis upon which this Application could be classified as other than non-controversial.

Applicant believes that this Application and the exhibits attached hereto contain all of the information that is required to support the requested expedited relief. Applicant is prepared, however, to provide such other information as the Commission may require to act on this Application.

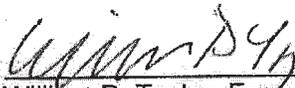
**XV. CONCLUSION.**

Open Top Sightseeing Los Angeles, LLC requests that it be authorized to provide scheduled service with the County of Los Angeles, pursuant to the ZORF described herein.

Dated: November 23, 2010

Respectfully submitted,

HANSON BRIDGETT LLP  
William D. Taylor, Esq.  
500 Capitol Mall, Suite 1500  
Sacramento, CA 95814  
Telephone: (916) 442-3333  
Facsimile: (916) 442-2348  
Email: [wtaylor@hansonbridgett.com](mailto:wtaylor@hansonbridgett.com)

By:   
William D. Taylor, Esq.  
Attorneys for Protestant  
Open Top Sightseeing Los Angeles LLC

**VERIFICATION**

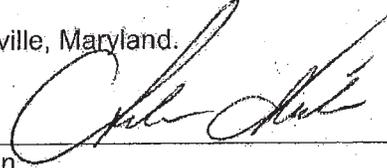
I, Anders Nielsen, state:

I am the President of Open Top Sightseeing Los Angeles, LLC and I am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 23, 2010, at Hyattsville, Maryland.

\_\_\_\_\_  
Anders Nielsen



# ***Exhibit 1***

# Delaware

PAGE 1

*The First State*

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "OPEN TOP SIGHTSEEING LOS ANGELES, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE EIGHTH DAY OF SEPTEMBER, A.D. 2010.

4864216 8300

100891185

You may verify this certificate online  
at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)



  
Jeffrey W. Bullock, Secretary of State  
AUTHENTICATION: 8215617

DATE: 09-08-10

# ***Exhibit 2***

**State of California  
Secretary of State**

**CERTIFICATE OF REGISTRATION**

I, DEBRA BOWEN, Secretary of State of the State of California, hereby certify:

That on the **14th day of September, 2010**, **OPEN TOP SIGHTSEEING LOS ANGELES, LLC**, complied with the requirements of California law in effect on that date for the purpose of registering to transact intrastate business in the State of California; and further purports to be a limited liability company organized and existing under the laws of **Delaware** as **OPEN TOP SIGHTSEEING LOS ANGELES, LLC** and that as of said date said limited liability company became and now is duly registered and authorized to transact intrastate business in the State of California, subject, however, to any licensing requirements otherwise imposed by the laws of this State.

**IN WITNESS WHEREOF**, I execute  
this certificate and affix the Great Seal  
of the State of California this day of  
September 15, 2010.



*Debra Bowen*

**DEBRA BOWEN  
Secretary of State**

# ***Exhibit 3***

Open Top Sightseeing - Los Angeles  
BUDGET

	January 6758	February 7096	March 7451	April 7823	May 8215	June 6161	July 6315	August 6473	September 6635	October 8623	November 9037	December 9509	total 90118
PAX	236,530.00	248,360.00	260,785.00	273,805.00	287,525.00	215,635.00	221,025.00	226,555.00	232,225.00	301,875.00	316,995.00	332,815.00	3,154,130.00
Ticket Sales	236,530.00	248,360.00	260,785.00	273,805.00	287,525.00	215,635.00	221,025.00	226,555.00	232,225.00	301,875.00	316,995.00	332,815.00	3,154,130.00
Total Revenues	236,530.00	248,360.00	260,785.00	273,805.00	287,525.00	215,635.00	221,025.00	226,555.00	232,225.00	301,875.00	316,995.00	332,815.00	3,154,130.00
Cost of Sales	32,000.00	32,000.00	32,000.00	32,000.00	32,000.00	32,000.00	32,000.00	32,000.00	32,000.00	32,000.00	32,000.00	32,000.00	384,000.00
Drivers	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	144,000.00
Sales Staff	16,500.00	16,500.00	16,500.00	16,500.00	16,500.00	16,500.00	16,500.00	16,500.00	16,500.00	16,500.00	16,500.00	16,500.00	198,000.00
Managers	3,300.00	3,300.00	3,300.00	3,300.00	3,300.00	3,300.00	3,300.00	3,300.00	3,300.00	3,300.00	3,300.00	3,300.00	39,600.00
HQ cost	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	12,000.00	144,000.00
Insurance - Buses Liability	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	9,000.00
Insurance - Co Car Liability	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	24,000.00
Worker's Comp Insurance	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	60,000.00
SS/Med contribution	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	24,000.00
Unempl ins contributions	17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	210,000.00
Bus maint & repairs-Labor	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	168,000.00
Fuel/Oil - Busses	250.00	250.00	250.00	250.00	250.00	250.00	250.00	250.00	250.00	250.00	250.00	250.00	3,000.00
Uniforms	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	2,400.00
Pricing/Bridge fares	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	12,000.00
Bank & credit card fees	29,566.25	31,045.00	32,598.13	34,225.63	35,940.63	26,954.38	27,628.13	28,319.38	29,028.13	37,734.38	39,624.38	41,601.88	394,266.25
Commission	148,066.25	149,545.00	151,098.13	152,725.63	154,440.63	145,454.38	146,128.13	146,819.38	147,528.13	156,234.38	158,124.38	160,101.88	1,816,266.25
Total Cost of Sales	88,463.75	98,815.00	109,686.88	121,079.38	133,084.38	70,180.63	74,896.88	79,735.63	84,696.88	145,640.63	158,870.63	172,713.13	1,337,863.75
Gross Profit	148,066.25	149,545.00	151,098.13	152,725.63	154,440.63	145,454.38	146,128.13	146,819.38	147,528.13	156,234.38	158,124.38	160,101.88	1,816,266.25
Expenses	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	12,000.00
Management expense	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	9,000.00
Fuel costs-Suprns, CoCars	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	12,000.00
Insurance costs	1,300.00	1,300.00	1,300.00	1,300.00	1,300.00	1,300.00	1,300.00	1,300.00	1,300.00	1,300.00	1,300.00	1,300.00	15,600.00
Insurance - Gen Liability	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	2,400.00
Paycheck fees	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	36,000.00
Office costs	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	12,000.00
Phone costs	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	12,000.00
Professional Fees	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	4,800.00
CoCars/Vans	4,000.00	4,000.00	4,000.00	4,000.00	4,000.00	4,000.00	4,000.00	4,000.00	4,000.00	4,000.00	4,000.00	4,000.00	48,000.00
Attorney fees	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	36,000.00
Travel costs	300.00	300.00	300.00	300.00	300.00	300.00	300.00	300.00	300.00	300.00	300.00	300.00	3,600.00
Meals	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	24,000.00
Merchant fees	3,500.00	3,500.00	3,500.00	3,500.00	3,500.00	3,500.00	3,500.00	3,500.00	3,500.00	3,500.00	3,500.00	3,500.00	42,000.00
Rents	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	60,000.00
Marketing (brochures, etc.)	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	4,800.00
Postage & shipping costs	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	12,000.00
Licenses, other	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	12,000.00
Tax, tax prep.	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	750.00	9,000.00
Background checks & DOT	11,665.00	11,665.00	11,665.00	11,665.00	11,665.00	11,665.00	11,665.00	11,665.00	11,665.00	11,665.00	11,665.00	11,665.00	139,980.00
Depreciation Expense	42,265.00	42,265.00	42,265.00	42,265.00	42,265.00	42,265.00	42,265.00	42,265.00	42,265.00	42,265.00	42,265.00	42,265.00	507,180.00
Total Expenses	46,198.75	56,550.00	67,421.88	78,814.38	90,819.38	27,915.63	32,631.88	37,470.63	42,431.88	108,375.63	116,605.63	130,448.13	830,683.75
Net Income	148,066.25	149,545.00	151,098.13	152,725.63	154,440.63	145,454.38	146,128.13	146,819.38	147,528.13	156,234.38	158,124.38	160,101.88	1,816,266.25

# ***Exhibit 4***

# LOS ANGELES

To San Geronimo  
Wilderness

Ontario

To Palm  
Springs

Fruit Flats  
Central Area

Mission  
Viejo

Azusa

Pomona

Diamond  
Bar

Disneyland

Huntington • Irvine  
Beach

Pasadena

San  
Gabriel

East Los  
Angeles

Whittier

Knott's Berry  
Farm

Fountain  
Valley • Santa  
Ana

Glendale

La Brea  
Tar Pits

Downtown  
Los Angeles

Inglewood

Compton

Long  
Beach

San Pedro  
Bay

To Santa  
Catalina  
Island

Universal  
City

Hollywood

Los Angeles

Downtown  
Los Angeles

Inglewood

Compton

Torrance

Long  
Beach

San  
Pedro Seal Beach

Woodland  
Hills

To Santa  
Barbara

Getty  
Center

Beverly  
Hills

Malibu Santa  
Monica Venice

Santa  
Monica  
Bay

Manhattan Beach  
Hermosa Beach  
Redondo Beach

PACIFIC  
OCEAN



**PROOF OF SERVICE**

I, Kim Hering, declare that I am a resident of the State of California. I am over the age of 18 years and not a party to this matter; that my business address is 500 Capitol Mall, Suite 1500, Sacramento, CA 95814. On November 24, 2010, I served a true and accurate copy of the document(s) entitled:

**APPLICATION FOR AUTHORITY TO PROVIDE SCHEDULED SERVICE AND TO ESTABLISH A ZONE OF RATE FREEDOM**

on the party(ies) in this action by placing said copy(ies) in a sealed envelope, each addressed to the last address(es) given by the party(ies) as follows:

**KAREN CLOPTON**  
Chief Administrative Law Judge  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**LOS ANGELES METROPOLITAN  
TRANSPORTATION AUTHORITY**  
One Gateway Plaza  
Los Angeles, CA 90012-2952

**ANDREA SHERIDAN ORDIN**  
Los Angeles County Counsel  
648 Kenneth Hahn Hall of Admin  
500 West Temple Street, Ste. 648  
Los Angeles, CA 90012

**PAUL WUERSTLE**  
California Public Utilities Commission  
Transportation Enforcement Branch  
Room 2107  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**RICHARD CLARK**  
California Public Utilities Commission  
Transportation Enforcement Branch  
Room 2205  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

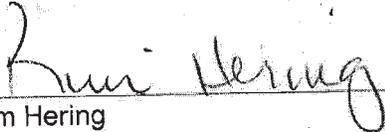
**SUONG T. LE**  
California Public Utilities Commission  
Transportation Enforcement Branch  
Area 2-C  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**GREG BRAGG**  
California Highway Patrol  
P.O. Box 942898  
Sacramento, CA 94289-0001



(By First Class Mail pursuant to Code of Civil Procedure section 1013.) I am readily familiar with Hanson Bridgett's practices for collecting and processing documents for mailing with the United States Postal Service. Following these ordinary business practices, I placed the above referenced sealed envelope(s) for collection and mailing with the United States Postal Service on the date listed herein at 500 Capitol Mall, Suite 1500, Sacramento, California 95814. The above referenced sealed envelope(s) will be deposited with the United States Postal Service on the date listed herein in the ordinary course of business.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

  
\_\_\_\_\_  
Kim Hering