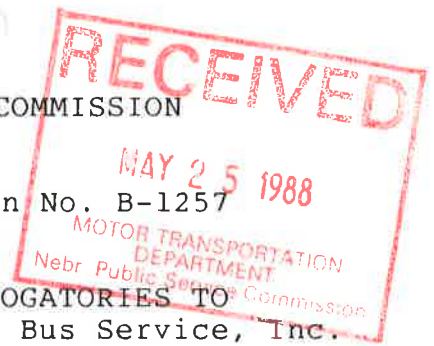


BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE
APPLICATION OF Chief School
Bus Service, Inc.,
Omaha, Nebraska

) Application No. B-1257
)
)
) INTERROGATORIES TO
) Chief School Bus Service, Inc.
)
)



To: Chief School Bus Service, Inc., 3111 South 67th
Street, Omaha, Nebraska 68106.

Pursuant to Rule 016.11 of the Nebraska Public Service Commission Rules of Commission Procedure and Rule 33 of the Nebraska Discovery Rules, you are required to answer fully and under oath each of the following Interrogatories and to serve a copy of your answers thereto upon Protestant's attorney within thirty (30) days after the service of these Interrogatories upon you. Your answers should include, as to each matter inquired of, not only all information you have but all such information as is available to you, as required by law. Although your responses to the foregoing Interrogatories may be correct and complete when made, it is your continuing duty thereafter and until the time of hearing seasonably to supplement your responses if further information relating thereto is acquired by you or your attorneys, in the manner and to the extent required by law.

DEFINITIONS

1. "You" or "your" refers to Chief School Bus Service, Inc. ("Chief School") and any other person or persons acting or purporting to act on its behalf.

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2. The term "document" or "documents" means any printed, typewritten, handwritten, or otherwise recorded matter of whatever character, including, but not limited to correspondence, letters, books, memoranda, telegrams, notes, contracts, invoices, checks, notices, diaries, reports, summaries or other records of personal conversations, minutes or summaries of other records of meetings and conferences, calendars, appointment books, worksheets, work papers, notes, graphs, charts, tables, notebooks, marginal notes, files, data printouts, data compilations (both in existence and in memory components), microfilm, microfiche, telegrams, teletype or telefax messages, transcripts, photographs, video records, other electronic or mechanical recordings, including tapes and cassettes, as well as any other tangible thing on which information is recorded in writing or sound or in any other manner.

3. The terms "identify" and "identity" when used in reference to a natural person mean to state his or her full name, present or last known address, telephone number, employer and position at the time(s) in question, and his or her present employment position and business address.

4. The terms "identify" and "identity" when used in reference to any other entity included in the definition of "person" set forth above, other than a natural person, mean to state the full name of such entity, the date and state of its incorporation or organization, its present or last known address, a description of the form of such entity, and the

identity of any natural persons with such entity known to you to have any knowledge of the matter inquired of.

5. "Identify" or "identity" as used in reference to a document means to state the date of its preparation and author, the type of document (e.g. letter, memorandum, report, etc.) and its present location and custodian, or to otherwise identify it with sufficient particularity to be readily subject to a request to produce.

6. The word "identify" or "identity" when used with respect to any nonwritten communication means to identify the natural persons making and receiving the communication, the date, manner and place of communication, the identity of all persons present during any portion of such communication, and the substance of the communication.

7. The terms "and" and "or" shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these Interrogatories any information or documents which might be deemed beyond their scope by another construction.

8. An Interrogatory calling for the basis of any allegation, claim or denial is a request to:

- A. State and identify completely all sources and information upon which such allegation, claim or denial is predicated; and
- B. State and identify completely all acts, omissions, conduct, events, transactions, documents and conversations of which you have knowledge or

information which form the predicate of any such allegation, claim or denial.

INSTRUCTIONS

In answering each Interrogatory:

1. Furnish all information available to and known by you, or in your possession, or that of your agents and attorneys, or appearing in your records.

2. If documents are attached, designate on each attachment the Interrogatory it is in response to.

3. Identify each document relied upon or which forms a basis for the answer given or which corroborates the answer given.

4. State whether the information furnished is within the personal knowledge of the person answering and if not, the identity of each person to whom such information is a matter of personal knowledge.

5. If you maintain that any document or record which refers to or relates to anything about which these Interrogatories ask has been destroyed, set forth the contents of said documents, the location of any copies of said documents, the date of such destruction and the name of the person who ordered or authorized such destruction.

6. With respect to any document which you are requested to identify in these Interrogatories and which you claim to be privileged or work product, provide a statement under oath by a person having knowledge setting forth as to each such document the identity of the author and each recipient of the document or any copy thereof, the date of the document, the date on

which the document was received, a brief description of the nature and subject matter of the document and the statute, rule or decision which is claimed to give rise to any privilege or status as work product.

INTERROGATORIES

INTERROGATORY NO. 1: Identify all officers, directors and shareholders of Chief School, and with respect to officers indicate the office or offices held by each individual so identified.

ANSWER:

INTERROGATORY NO. 2: Does Chief School or any of its officers, directors or shareholders own, control or otherwise have any financial interest in any operating rights granted by the Nebraska Public Service Commission?

ANSWER:

INTERROGATORY NO. 3: If Interrogatory No. 2 is answered in the affirmative, identify the carrier or carriers to whom such operating rights have been issued.

ANSWER:

INTERROGATORY NO. 4: Identify each company that requested Chief School to file this application.

ANSWER:

INTERROGATORY NO. 5: Identify each company that Chief School has contacted to request support for this application.

ANSWER:

INTERROGATORY NO. 6: With respect to each company identified in response to Interrogatories Nos. 4 and 5,

- (a) Identify each company employee with whom Chief School has discussed this application;
- (b) Identify each discussion with each company employee identified in response to Interrogatory No. 6(a);
- (c) Identify all correspondence and other documents sent by the company to Chief School or by Chief School to the company respecting transportation to be performed by Chief School in Nebraska intrastate commerce; and
- (d) If the company has agreed to provide one or more witnesses to testify in support of this application, identify each such witness.

ANSWER:

INTERROGATORY NO. 7: With respect to each witness that Chief School intends to call at the hearing on this application:

- (a) Identify the witness;
- (b) Indicate the scope of the witness' duties and responsibilities in his or her current position;
- (c) Indicate whether the witness has been authorized by his or her employer to testify at the hearing on this application and, if so authorized, identify the person giving such authorization;
- (d) Describe the nature of the evidence expected to be presented by the witness at the hearing; and
- (e) If the witness will present evidence of alleged deficiencies in existing transportation service, describe specifically each instance of alleged service deficiency of which evidence will be presented by the

witness and identify each document upon which the witness will rely to support such allegation.

ANSWER:

INTERROGATORY NO. 8: Indicate the year, make, serial number, type, rated passenger capacity, and identity of lessee if leased, of each unit of equipment owned or leased by Chief School as of the date Answers to these Interrogatories are made.

ANSWER:

INTERROGATORY NO. 9: Indicate which, if any, of the units of equipment identified in response to Interrogatory No. 8 will be used by Chief School to provide transportation under the authority sought by this application.

ANSWER:

INTERROGATORY NO. 10: Does Chief School intend to purchase or lease additional units of equipment to provide transportation under the authority sought by this application?

ANSWER:

INTERROGATORY NO. 11: If Interrogatory No. 10 is answered in the affirmative, indicate:

- (a) The anticipated number of additional units of equipment that Chief School intends to obtain to use to provide transportation under the authority sought by this application; and
- (b) The anticipated date or dates when such additional units of equipment will be obtained by Chief School.

ANSWER:

INTERROGATORY NO. 12: Indicate:

- (a) Each point in Nebraska at which Chief School has units of equipment stationed at the present time; and
- (b) The number of units of equipment presently stationed by Chief School at each such point.

ANSWER:

INTERROGATORY NO. 13: Indicate:

- (a) Each point (including points identified in response to Interrogatory No. 12, if appropriate) in Nebraska at which Chief School intends to station units of equipment for use under the authority sought by this application; and
- (b) The total number of units of equipment to be stationed by Chief School at each such point.

ANSWER:

INTERROGATORY NO. 14: Has equipment owned or leased by Chief School been used during the period of such ownership or term of such lease to provide transportation in Nebraska intrastate commerce for passengers and their baggage from and/or to points in Nebraska?

ANSWER:

INTERROGATORY NO. 15: If Interrogatory No. 14 is answered in the affirmative:

- (a) Identify all documents and other records maintained by Chief School evidencing such transportation;
- (b) Provide a summary of all such transportation by Chief School during the period from January 1, 1987 to April 30, 1988, indicating on the summary with respect

to each separate occasion when such transportation was performed: (i) the date such transportation was performed, (ii) the origin, (iii) the destination, (iv) the transportation charges paid or payable to Chief School and (v) the identity of the company served;

- (c) For each separate occasion when transportation was performed as indicated on said summary which was not authorized to be transported under a certificate or permit held by Chief School from the Nebraska Public Service Commission at the time of such transportation, explain why the performance of such transportation by Chief School was lawful;
- (d) If any of such transportation was performed under lease to other carriers, identify each such lease and indicate the name and "B" number of each such lessee carrier; and
- (e) Identify each communication (whether oral or written) received by Chief School from the Nebraska Public Service Commission respecting the performance of such transportation.

ANSWER:

INTERROGATORY NO. 16: Has Chief School determined the rates it intends to charge to provide transportation under the authority sought by this application?

ANSWER:

INTERROGATORY NO. 17: If Interrogatory No. 16 is answered in the affirmative, indicate the rates Chief School intends to

charge for transportation to be performed under the authority sought by this application.

ANSWER:

INTERROGATORY NO. 18: Identify each written contract entered into or proposed to be entered into by Chief School with any company during the period from January 1, 1987 through April 30, 1988 respecting the transportation of passengers and their baggage in Nebraska intrastate commerce.

ANSWER:

INTERROGATORY NO. 19: Identify:


- (a) The most recent year-end balance sheet and income statement of Chief School; and
- (b) The most recently prepared balance sheet and income statement of Chief School.

ANSWER:

INTERROGATORY NO. 20: What is the current Motor Carrier Safety Rating assigned to Chief School by the U.S. Department of Transportation?

ANSWER:

BROWN'S CREW CAR OF WYOMING, INC.,
d/b/a ARMADILLO EXPRESS,
Protestant

By: 
BRADFORD E. KISTLER
Attorney for Protestant
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P. O. Box 82028
Lincoln, NE 68501-2028
(402) 475-6761

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Interrogatories to Chief School Bus Service, Inc. was served upon Applicant by mailing a copy of same to Chief School Bus Service, Inc., 3111 South 67th, Omaha, NE 68106 by United States mail, first-class postage prepaid this ~~24th~~ day of May, 1988.


Bradford E. Kistler

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