## Decision No. 40485

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of E. O. HURLBERT and V. G. KEYES, a partnership, doing business as GENERAL TRANSFER COMPANY, for a certificate of public convenience and necessity to operate as a highway common carrier between certain points in the San Joaquin Valley and Stockton and San Francisco Bay points and certain intermediate points.

In the Matter of the Application of ) ANDRUS HURLBERT, VINCENT G. KEYES and ) ELMER O. HURLBERT, partners in business) under the name of GENERAL TRANSFER ) COMPANY, for certificate of public ) convenience and necessity to operate ) a freight transportation service by ) motor truck over the public highways ) as a common carrier between the cities ) of Stockton, California, and Fresno, ) California.

Application No. 18873

Application No. 24202

ORIGINAL

J. RICHARD TOWNSEND for applicant.

R. E. WEDEKIND and WILLIAM MEINHOLD for Southern Facific Company and Pacific Motor Trucking Company, protestants.
WILLIAM F. BROOKS and STAR THOMAS for The Atchison, Topeka & Santa Fe Railway Company, protestant.
ROBERT S. CROSSLAND and HAROLD FRASHER for Valley Motor Lines, Inc. and Valley Express Company, protestants.
DOUGLAS BROOKMAN and EDWARD P. ST. CLAIR for California Motor Transport co., Ltd. and California Motor Express. Ltd.

protestants. W. R. HOIMES for Bekins Van and Storage Co., interested party. BEROL & HANDLER, by Marvin Handler, for Fortier Transportation Co., interested party.

J. J. DEUÉL for Fresno County Farm Bureau, interested party.

## OPINION ON REHEARING

By Application No. 24202, E. O. Hurlbert and V. G. Keyes, partners, doing business as General Transfer Company, seek a certificate of public convenience and necessity under Section 50-3/4, Public Utilities Act, authorizing the operation of a highway common carrier service for the transportation of general commodities (with certain

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exceptions) between Selma and Fresno, on the one hand and, on the other hand, Stockton and points within one sile thereof, San Francisco, Oakland (including Emeryville, Fruitvale and Melrose) San Leandro, Alameda, Berkeley, El Cerrito, Richmond, Hayward, South San Francisco, San Bruno, Palo Alto, Sunnyvale, Santa Clara and San Jose. The territory intermediate to Fresno and Selma, and Bay Points, would not be served. By Application No. 18873, the same applicants, together with another partner, now deceased, sought a certificate authorizing the operation of a similar service between Stockton and Fresno, excluding intermediate points. The applications were opposed by certain carriers in the field, viz.: Southern Pacific Company, Pacific Motor Trucking Company, The Atchison Topeka & Santa Fe Railway Company, Valley Motor Lines, Inc., Valley Express Company, California Motor Transport Co., Ltd., and California Motor Express, Ltd. Bekins Van & Storage Co. and Fortier Transportation Company appeared as interested parties, and Fresno County Farm Bureau intervened on behalf of the applicant.

Following extensive public hearings, the applications were denied by Decision No. 37892, rendered May 15, 1945. Thereafter, at applicant's instance, rehearing was granted. Such rehearing was had before Examiner Austin at San Francisco, Oakland and Fresno, during (2) the period extending from March 26, 1946, to February 20, 1947, when the matter was submitted on briefs, since filed.

- (1) For brevity, the protesting carriers will be referred to, respectively, as Southern Facific, Pacific Motor, Santa Fe, Valley, Valley Express, California Motor and California Motor Express. The applicants, E. O. Hurlbert and V. G. Keyes will be designated either as General Transfer or as the applicant.
- (2) Public Hearings were had at Fresno on March 26, 27 and 22, 1946; at San Francisco on April 22, 23 and 24, 1946; at Fresno on May 16 and 17, 1946; at San Francisco on June 24 and 25, 1946; at Oakland on June 26 and 27, 1946; at San Francisco on August 26, 27, 28 and 29, and on November 12, 13, 14 and 15, 1946; and at Fresno on February 17, 12, 19 and 20, 1947. On the latter date the matter was submitted, subject to the filing of briefs which have since been received.

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In support of its proposal, applicant called shipper and other public witnesses engaged in business at Fresno, Selma, San Francisco, Oakland and other East Bay cities. On rehearing, it offered no testimony descriptive of the contemplated service, electing to stand upon the showing made at the original hearing. Through their respective operating officials, protestants described the nature of their operations; they also produced shipper-witnesses, representing firms engaged in business at the points mentioned.

As stated in our original decision, applicant and its predecessors long have served this territory as a highway carrier. Since 1935, it has operated as a radial highway common carrier, under permits issued by the Commission. Applicant also holds a certificate issued by the Interstate Commerce Commission, authorizing operation as a common carrier by motor vehicle between Selma and San Francisco, serving intermediate and certain off-route points, including Stockton. Its headquarters are maintained at Fresno.

For many years applicant confined its operations largely to the transportation of interstate traffic. This consisted of freight moving by steamer to San Francisco and Stockton, and thence by truck to Fresno and Selma. Following the outbreak of the war, intercoastal steamer service was withdrawn, and the traffic has shifted to the railroads. Frequently, considerable difficulty has been experienced in determining whether the trucking movement beyond San Francisco is interstate or intrastate in character. A substantial share, it appears, is intrastate. To remove all doubt concerning its authority to accommodate shippers offering this traffic, and to perform the service, applicant seeks an intrastate operative right.

Applicant proposes to establish a scheduled overnight

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Service available daily, except Saturday, Sunday and holidays, between Selma and Fresno and San Francisco Bay Points and Stockton; all other roints would be served on call. Terminals would be established at Stockton and Oakland, in addition to those now located at San Francisco and Fresno. Agencies, staffed by applicant's employees, would be maintained at these points. In general, applicant's rates would correspond with those published by Valley. Pickup and delivery service would be afforded at Fresno, Stockton, San Francisco and Oakland.

Applicant called some 110 public witnesses, representing shippers and others engaged in business at Fresno and San Francisco Bay communities. Their testimony dealt with the growth and development of the Fresno territory; with the need for an adequate transportation service; and with the character of the service furnished by the existing carriers.

Many of these witnesses described the substantial growth and development which this territory has recently experienced. Between 1940 and 1946, it was shown, the population of Fresno County increased from 178,000 to 225,000; during the same period, that of the Fresno metropolitan area increased from 90,000 to 110,000. A survey of housing and construction needs, made in 1945 at the instance of the State Reconstruction and Reemployment Commission, indicated that the city population had augmented at the rate of 6 per cent annually. Some 7000 new homes are needed to accommodate accumulated and current domends.

This region is developing industrially, these shippers testified. Prior to the war Fresno shops confined their activities largely to repair work. However, following their reconversion from wartime pursuits, they are currently engaged in the manufacture of

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verious products, such as agricultural, fruit packing and winery machinery, sprinkler systems, signal arms for trucks and cars, pumps and vending machines. Employment has kept pace with increased production. Several shippers anticipated substantial growth in business.

The volume of traffic moving to and from Fresno has increased materially, it was shown. Data submitted by Southern Pacific disclose that the volume of less-car-load traffic, moving southbound from San Francisco and Oakland to Fresno and Selma increased threefold from 1940 to 1946, and the northbound movement (3) doubled. The situation at Selma is similar, though the growth has been on a smaller scale. The increase in population and in industrial development since 1940 has been substantial.

On behalf of applicant, some 103 shipper witnesses, representing 100 firms engaged in business throughout the territory (4) involved, described their transportation needs. They dealt in a wide variety of commodities. The volume of their shipments was substantial.

All of these shippers emphasized the desirability of an expeditious overnight service. This is essential, they stated, to permit the prompt replenishment of depleted stocks of merchandise, to enable them to maintain smaller inventories and to permit the prompt delivery of emergency repair parts and perishable commodities. Many had suffered business losses occasioned by delays in transit. All asserted they would use applicant's service if it were established.

 (4) Of the firms represented, 43 were engaged in business at Fresno;
 4 at Selma; 36 at San Francisco; 14 in Oakland; 1 at Berkeley; 1 at Alameda and 1 at Hayward.

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<sup>(3)</sup> As shown by Exhibit R-10, the southbound movement of less-car-load freight from San Francisco and Oakland to Fresno and Selma increased from 1,043,700 pounds in May, 1940, to 3,138,100 in May, 1946. The northbound movement increased from 53,200 pounds in May, 1940, to 103,800 in May, 1946.

With substantial unanimity, these shippers expressed their disapproval of the quality of the scrvice which had been provided by one or more of the carriers in the field. Principally, they complained of delays in transit and in providing pickup service. Shipments moving from San Francisco and East Bay points to Fresno and Selma consumed from three to four days enroute, and even longer, they stated. Some shipments were delayed from two weeks to 30 days, but these were not typical. Valley, it was said, and the other carriers to a lesser degree, had delayed responding to requests for pickup service. These complaints were directed chiefly against Valley. Frequently, so they testified, it had failed to respond to such calls for two or three days, and sometimes longer. Often, it was stated, these delays were due to congestion of freight at the terminals. Occasionally, Valley suggested that heavy or bulky shipments be turned over to some other carrier for transportation. This, however, was not the general practice.

Valley, so meny of these shippers testified, frequently had declined to handle certain types of commodities. Within this category were included pipe measuring 19 feet or more in length, corrosive acids, septic tanks and structural steel. Some asserted that California Motor also had rejected shipments of pipe of this character. On such occasions, these shipments were offered to the rail lines for transportation. At times shipments were not delivered promptly following their arrival at destination, some of the shippers asserted. Occasionally, only part of a shipment was delivered, the rest remaining in the carrier's possession until identified by the consignee. Several shippers asserted they hed observed but little, if any, improvement in service since the termination of the war.

Of the shipper witnesses called by protestants, some 33

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complained of the service which had been provided by one or more of (5) those carriers. Valley, so most of them testified, had delayed responding to calls for pickup service for periods ranging from one to four days, and in some instances longer. Many asserted they had telephoned several times before their freight was picked up. A few described similar delays experienced at the hands of Pacific Motor and California Motor. Overnight service, some stated, had not been provided by Southern Pacific-Pacific Motor, Santa Fe nor Valley. On some occasions delays in delivery of freight had occurred at destination. Valley, some testified, had declined to accept shipments of certain types, including pipe exceeding 21 feet in length, and structurel steel.

Several shipper witnesses testified that their firms had used applicant's facilities for the transportation of freight. None had entered into any agreement with applicant relating to the performance of this transportation service. Representatives of 41 firms SO testified, stating, in general, that applicant had carried their shipments between Fresno, San Francisco and East Bay Cities. Though the lack of any transportation agreement was shown (in some instances, by testimony of a negative character) applicant did not challenge this testimony.

This brings us to the showing made on behalf of the protestants. Through their operating officials, the service which they severally have provided was described. Testimony of this character was offered by Valley, California Motor, Santa Fe and Southern Pacific-Pacific Motor.

Velley undertakes to provide an overnight service between San Francisco, East Bay points and San Jose, on the one hand, and

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<sup>(5)</sup> Seventeen of the firms represented by these witnesses were engaged in business in San Francisco; one in Oakland and 15 at Fresno.

Fresno, on the other. Terminals are maintained at San Francisco, Oakland, San Jose, Manteca and Fresno. Fickup and delivery service is provided at San Francisco, East Bay points and Fresno. Selma is served through Huntington Stage Lines, which connects with Valley at Fresno.

Because of war-generated conditions, Valley had been obliged to curtail the service which it previously had afforded. Its president and general manager testified that it had not yet recovered from these setbacks. Due to shortages, equipment could not be readily replaced, and consequently was continued in service long beyond the time when it should have been retired.

Operating personnel were less efficient than those previously employed. To curtail expenses, which constantly have been rising, the pickup service was placed upon an on-call basis, and shippers were advised accordingly. Owing to these circumstances, this protestant has experienced difficulty in performing an adequate pickup service.

The adjustment of freight claims, so this official testified, had not been unduly delayed. To guard against the payment of unfounded or excessive claims, which greatly would increase the cost of operation, this protestant, he said, had found it necessary to investigate carefully every claim that may be preferred.

California Motor, so its operating officials stated, offers an overnight service between San Francisco, Oakland and Fresno, providing first-morning delivery. Terminals are maintained at San Francisco, Oakland and Fresno, where also a pickup and delivery service is afforded. A substantial fleet of equipment is available.

Santa Fe, so its representatives testified, offers an overnight service between San Francisco, East Bay points and Fresno,

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supplying first-morning delivery. Pickup and delivery service is maintained at these points. Wartime shortages, both of manpower and equipment, have been alloviated, they said. This protestant considers itself fully equipped, at the present time, to perform an adequate service.

Southern Pacific undertakes to supply an overnight service for less-car-load shipments moving from San Francisco and East Bay points to Fresno, affording first morning delivery. At these points, pickup and delivery service is provided by Pacific Motor or by draymen with whom the latter has contracted to supply the service. This traffic is handled by the Bakersfield Merchandise, a fast freight train leaving San Francisco, and also Oakland through a connecting train, during the early evening, and reaching Fresno early the next morning. Shipments originating at Peninsula points extending from San Francisco to Redwood City are accorded first-morning delivery. Traffic moving from the territory extending from Redwood City to San Jose receives second-morning delivery.

During the war, it was stated, this protestant withdrew its fast overnight freight trains, including that which previously had served this territory, in order to supply equipment needed for wartime activities. Not until April, 1946, was this service restored between San Francisco Bay points and Fresno. This protestant has on order additional equipment which, when obtained, will enable it more fully to meet the shippers' requirements.

Statements were submitted by certain protestants indicating the actual performance during periods selected as representative, of their service between the points affected. Such a showing was offered by Valley, Santa Fe and Southern Pacific-Pacific Motor.

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The evidence submitted by Valley, which was based upon its shipping records, dealt with the character of its performance during March, 1946. This was designed to indicate the actual time in transit of shipments moving between San Francisco-East Bay points, and Fresno and Selma, during that period. Most of these shipments, it appears, received overnight delivery, and the remainder, second-day delivery. A statement, designed to show the performance of pickup service during this period, indicates that, with few exceptions, shipments were picked up on the bill of lading date. It was conceded, however, that this exhibit did not reflect the time when pickup service had been requested by the shippers. No permanent record of these calls, it appears, had been preserved. The bill of lading date, it was stated, ordinarily indicates when the consignor had concluded to offer the shipment for transportation.

Santa Fe submitted a showing of performance covering a selected weekly period during July, 1946. Ordinarily, it was stated, the bill of lading date indicates when the shipments move; only occasionally is it predated. The freight delivery receipt, signed by consignee, indicates the date of arrival at destination. The data submitted rest upon information supplied by these documents. Shipments moving from San Francisco, it appears, ordinarily were delivered from two to four days after they had been received; many were delivered five days, and some one week, after their receipt. Overnight delivery seldom had been afforded. From Oakland, however, most shipments were delivered on the first day after their receipt by the carrier. Some were accorded second-day delivery and a few third and fourth-day delivery. These exhibits did not indicate when pickup service had been requested.

The showing offered by Southern Pacific covered the

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performance of its service during a selected period of 6 days in May, 1946. The date when shipments were received by the carrier, as shown in this statement, was derived from the shipping order, which indicates when the shipment was picked up by the draymen or when it was received at the depot, if delivered there by the consignor. The date of delivery is obtained from the delivery receipt signed by the consignee at destination point. During this period, it was shown, merchandise cars moved overnight from San Francisco and Oakland to Fresno, arriving there early the next morning, except in one instance when they were delayed a few hours by a train wreck near Burlingame. (6) The majority of these shipments received first-morning delivery.

Shipper witnesses, representing 105 firms engaged in (7) business throughout this territory, were called by protestants. In general, they testified that they regularly shipped or received a substantial volume of freight over the lines of one or more of the protestants; that the service provided by the carrier or carriers so used had been adequate and satisfactory; that in most instances an overnight service had been provided; and that they had no need for the service of any additional carrier. As stated, some of these witnesses, on cross examination, expressed dissatisfaction with the

- (6) Of some 854 shipments which moved from San Francisco during this period, 596 were accorded overnight first-morning delivery at Fresno. Of the remaining 258 shipments, 139 were delayed for reasons beyond the carrier's control, leaving 119 delayed shipments for which the carrier assumed responsibility. During the same period, 162 shipments moved from Oakland of which 111 received overnight delivery. Of the remaining 51 shipments, 39 were delayed for reasons beyond the carrier assumed the carrier's control, leaving 12 for which the carrier assumed responsibility.
- (7) These shippers were distributed throughout the effected territory as follows, viz.: Fresno 48; Stockton 1; San Francisco 51; Oakland 4; Berkeley 1. Of these, 20 were called by Southern Facific-Pacific Motor; 39 by Valley, and 46 by California Motors.

service furnished by one or more of the protestants. Some stated that, since the war, the quality of protestants' service had improved. Several San Francisco shippers testified that s single carrier serving a number of points where their products were marketed would better meet their requirements than two or more carriers serving only part of the territory. Thus, congestion at the loading platform would be avoided and they could take advantage of the lower split-delivery rates.

A representative of the Fresno County Farm Fureau voiced approval of applicant's proposal. The bureau, he stated, had assumed this position because of the complaint recently filed against applicant, before the Commission, by certain protestants herein, which sought an order requiring the discontinuance of certain alleged unlawful operations. Because of difficulties encountered by the existing carriers, involving delays in the delivery of freight and in furnishing cars ordered by shippers — which, he said, warrants the conclusion that these cerriers are unable to supply an adequate service — this organization would oppose any step leading ultimately to the elimination of a cerrier, such as applicant, who long had served its members. From their stendpoint, he stated, the continuation of (8) applicant's service must be regarded as a necessity.

Applicant contends that a public need has been shown for the establishment of an adequate overnight service between the points involved; that applicant is able to supply this need; and that protestents have failed to serve the territory adequately. The development of this area, it is pointed out, has been accompanied by a substantial increase in the volume of the traffic movement.

(8) No other reference to the institution of this proceeding appears in the record.

Protestant, on the other hand, contends that applicant's ability to provide the service has not been shown; that the unlawful operations in which applicant has engaged should preclude the granting of a certificate; that the testimony of the shipper witnesses, whom applicant produced, failed to establish any need for an additional carrier in this field; and that the service provided by the existing carriers adequately meets the public requirements.

It was clearly established that during and since the war, the Fresno area has experienced a marked development. Population has grown substantially. The number of manufacturing establishments has increased. No longer are they engaged merely in repair work; their activities now comprehend the production of manufactured articles which are marketed throughout this territory. The construction of homes and commercial buildings has increased. As a result, traffic moves in much heavier volume.

The shippers described their needs for a service which would fully meet their requirements. An expeditious service affording overnight delivery, they testified, is essential. Moreover they require a service which can properly accommodate the traffic offered.

Applicant, it was shown, is an experienced operator who long has served this territory. The record shows that he has provided an expeditious service. It is true that no additional showing was made, on rehearing, concerning the nature of his offer. However, this was fully covered during the original hearing, and is reflected by the recitals appearing in Decision No. 37892, where applicant's proposal was described in detail. There, we found that, ". . . Applicant's experience as a truck operator, and its financial ability to provide the service, are conceded." During the course of the rehearing, this finding was not questioned by protestants. Under the

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circumstances, we believe it unnecessary to require any further showing upon this point.

The character of the service furnished by the protesting carriers was established by the testimony of the shipper witnesses, and also by that of the operating officials whom protestants called. It is true that every shipper did not complain of the service provided by all of the carriers; that some shippers were not familiar with the service offered by certain carriers; and that some shippers were satisfied with the service provided by one or more of these carriers. However, the evidence adduced through these shippers, considered in " its entirety, clearly shows that the service furnished by the protestants, both individually and collectively, has not fully met their needs. The service provided by all of these carriers, it was shown, has been slow and subject to delays in transit. Valley, in particular. has neglected to respond promptly to pickup calls. The record of the other carriers is better, in this respect. Congestion at the terminals, particularly those of Valley, has interfered with the expeditious flow of traffic.

From the showing offered by protestant's operating officials it appears that some are more prompt than others in handling the traffic Offered. In general, Southern Pacific-Pacific Motor provides an overnight service, although a considerable share of the traffic was accorded second-day delivery. The traffic moving by Santa Fe encounters delays ranging from two to five days or more. Freight received by Valley, for the most part, is delivered overnight although some is delivered later. This showing, however, does not adequately meet the shippers' testimony regarding delays encountered in furnishing pickup service. California Motor made no detailed showing regarding its actual performance.

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Owing to conditions flowing from the war, the quality of the service provided by these carriers has deteriorated. All have experienced difficulties, in varying degrees, in restoring their prewar service. This, it was shown, has been due largely to their inability to replace wornout equipment, and to the diminishing efficiency of their personnel. These difficulties, the record shows, have been partly overcome, although they still persist to some extent.

The conclusion, we believe, is inescapable that the existing carriers have been unable adequately to handle all of the traffic offered. This may be due partly, though not wholly, to conditions beyond their control. However, where an experienced operator qualified to provide an efficient service, such as applicant, offers to enter the field, the shippers of this growing and developing territory are entitled to the benefits which would flow from the certification of such an additional service. These shippers should not be required to wait indefinitely until the carriers presently serving this territory, or some of them, can expand their facilities to a point sufficient to meet the public needs.

Applicant, as we have shown, has served several of the shippers represented at the hearing. It did so without having entered into any transportation agreement with them. However, this does not necessarily stamp these operations as unlawful. With respect to intrastate transportation, applicant undertakes to operate solely as a radial highway common carrier, not as a highway contract carrier. Under its permit, applicant is not required to enter into a transportation agreement with any shipper; as a radial highway common carrier, it is obliged to serve all shippers offering goods within the class which it undertakes to carry. A determination of the lawfulness of

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applicant's operations, as a radial carrier, would necessarily involve a consideration of its service between other points, in order to ascertain the extent of its over-all operations. Such a showing (9) was not made here. In the <u>Maloney</u> case, upon which protestants rely, the record dealt with the entire scope of the latter's operations. The present record does not justify the denial of the certificate sought, because of the character of applicant's operations.

Upon consideration of the record, we find that public . convenience and necessity require the establishment of the service which applicant proposes to furnish. Accordingly, the application will be granted.

## ORDER ON REHEARING

Application having been made as above entitled; rehearing therein having been had; the matter having been duly submitted and the Commission being now fully advised; and it having been found that public convenience and necessity so require:

IT IS ORDERED that:

(1) A certificate of public convenience and necessity is hereby granted to E. O. Hurlbert and V. G. Keyes, partners, authorizing the establishment and operation of a service as a highway common carrier, as defined by Section 2-3/4 of the Public Utilities Act, for the transportation of general commodities (except household goods, livestock, articles of unusual value and commodities requiring special equipment) between Selma and Fresno, on the one hand, and, on the other hand, Stockton and points within one mile thereof, San Francisco, Oakland (including Emeryville, Fruitvale and Melrose), San Leandro,

(9) Re: W. F. Maloney (Peninsula Motor Express), 46 CRC 662.

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Alameda, Berkeley, El Cerrito, Richmond, Hayward, South San Francisco, San Bruno, Palo Alto, Sunnyvale, Santa Clara and San Jose.

(2) In providing service pursuant to the certificate herein granted, applicant shall comply with and observe the following service regulations:

- (a.) Applicant shall file a written acceptance of the certificate herein granted within a period of not to exceed 30 days from the effective date hereof.
- (b.) Within 60 days from the effective date hereof and on not less than 5 days' notice to the Commission and the public, applicant shall establish the service herein authorized and comply with the provisions of General Order No. 80 and Part IV of General Order No. 93-1, by filing in triplicate and concurrently making effective, appropriate tariffs and time tables.
- (c.) Subject to the authority of this Commission to change or modify them by further order, applicant shall conduct operations pursuant to the certificate herein granted over and along the following routes:
  - a. Between Selma and Fresno and Stockton:

From Selma over U. S. Highway 99 to Stockton.

- b. Between Selma and Fresno, on the one hand, and San Francisco, Oakland, San Leandro, South San Francisco, San Bruno, Falo Alto, Sunnyvale, Santa Clara and San Jose, on the other hand:
  - From Selma over U. S. Highway 99 to Manteca, thence over California Highway 120 to junction U. S. Highway 50, and thence over U. S. Highway 50 to San Francisco, (also from Manteca over U. S. Highway 99 to Stockton, thence over U. S. Highway 50 to San Francisco).
  - (2) From Selma over U. S. Highway 99 to junction California Highway 152, thence over California Highway 152 to junction U. S. Highway 101, and thence over U. S. Highway 101 to San Francisco.

- (3) Alternative routes in connection with routes (1) and (2) above:
  - (a) Between San Jose and Oakland over California Highway 17.
  - (b) Between U. S. Highway 101 and Oakland over unnumbered county road via Alviso to Milpitas and thence California Highway 17 to Oakland.
  - (c) Between U. S. Highway 101 and Oakland over Dumbarton Bridge route to junction California Highway 17 and thence California Highway 17 to Oakland.
  - (C) Between U. S. Highway 101 and Oakland over San Mateo Bridge route to junction California Highway 17 and thence California Highway 17 to Oakland.

The effective date of this order shall be 20 days from the date hereof.

18873 (Rewrite)

Francisco, California, this\_ 28 ch Dated at day of 1947. 5. COMMISSIONERS