

WASHINGTON METROPOLITAN AREA TRANSIT COMMISSION

SILVER SPRING, MARYLAND

ORDER NO. 21,767

IN THE MATTER OF:

Served January 21, 2026

NEOM LIMO LLC, Suspension and )  
Investigation of Revocation of )  
Certificate No. 3783 )

Case No. MP-2026-002

Certificate No. 3783 was automatically suspended on January 1, 2026, pursuant to Regulation No. 58-12, for respondent's willful failure to maintain on file with the Commission proof of \$1.5 million in combined-single-limit, motor vehicle liability insurance. As a result, a \$100 late insurance fee became due and payable under Regulation No. 67-03(c), as noted in Order No. 21,736, served January 2, 2026. Order No. 21,736 also noted that Certificate No. 3783 would be subject to revocation if respondent failed to file the necessary insurance endorsement(s) and pay the \$100 late fee within thirty days.

In addition, because respondent held Certificate No. 3783 as of January 1 of this year, pursuant to Regulation Nos. 67-02 and 60-01, respondent is required to pay a \$175 annual fee for 2026 and file an annual report for 2026 on or before January 31.

Respondent requests a waiver of the annual fee and insurance late fee on the ground that it has discontinued operating. The Commission may waive its fees "upon the filing of a motion showing good cause."<sup>1</sup>

The Commission has consistently found that discontinuation of operations does not constitute good cause for waiving fees under Regulation No. 67,<sup>2</sup> and respondent offers no reason for changing that position.

The annual fee and report requirements apply to each carrier holding a certificate of authority on the first day of the calendar year - not just to those who hold authority and are operating.<sup>3</sup> Furthermore, the late fees under Regulation No. 67-03 attach immediately upon the triggering event because: "Carriers that file late or pay late place more

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<sup>1</sup> *In re Stream-Line Limo. Serv. Inc.*, No. MP-09-047, Order No. 12,024 (June 4, 2009).

<sup>2</sup> *See id.*; *In re David Timothy Robinson, t/a DR&W Transp. Servs.*, No. MP-09-010, Order No. 11,946 (Apr. 23, 2009); *In re Coach One, Inc.*, No. MP-07-097, Order No. 10,492 (May 17, 2007); *In re Avery Transp., LLC*, No. MP-06-195, Order No. 10,319 (Mar. 9, 2007).

<sup>3</sup> Order No. 12,024.

demands on Commission resources than those who file and pay on time.”<sup>4</sup> Simply discontinuing operations does not change that.

Respondent had ample opportunity to avoid these fees. Upon ceasing operations in 2025, if that is what happened, respondent could have applied to terminate its certificate of authority. Neither the 2026 annual report nor the 2026 annual fee would have been due<sup>5</sup> and the insurance late fee would have been avoided. Instead, respondent chose to retain its authority to transport passengers for-hire under Certificate No. 3783. In fact, respondent contemplates resuming operations, stating “Hopefully we can be back to market in 2027.”

Waiving fees under these circumstances would only encourage other carriers to engage in the same dilatory behavior. Accordingly, respondent’s request to waive fees under Regulation No. 67 is denied.

IT IS SO ORDERED.

BY DIRECTION OF THE COMMISSION; COMMISSIONERS LACKEY, ROGERS, AND LINTON:



Jeffrey M. Lehmann  
Executive Director

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<sup>4</sup> *In re Rulemaking to Amend Rules of Practice and Procedure and Regulations, Regulation No. 60, Reports, and Regulation No. 67, Fees*, No. MP-05-169, Order No. 9088 at 3 (Nov. 2, 2005).

<sup>5</sup> See *In re EGL Travel Ltd. Liab. Co., LLC*, No. AP-25-298, Order No. 21,726 (Dec. 29, 2025) (approving voluntary termination application same day filed).