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June 18, 2014

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Bureau of Investigation and Enforcement v. Uber Technologies, Inc.
Docket No. C-2014-2422723

Dear Secretary Chiavetta:

On behalf of Uber Technologies, Inc., I have enclosed for electronic filing the Motion of Uber Technologies, Inc. for Extension of Time to File Answer to Complaint in the above-captioned matter.

Copies have been served on all parties as indicated in the attached certificate of service.

Sincerely,



Karen O. Moury

KOM/tlg
Enclosure

cc: ALJ Jeffrey Watson and ALJ Mary D. Long (via email only)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**BUREAU OF INVESTIGATION
AND ENFORCEMENT**

v.

UBER TECHNOLOGIES, INC.

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Docket No. C-2014-2422723

**MOTION OF UBER TECHNOLOGIES, INC.
FOR EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Uber Technologies, Inc. (“Uber”), by and through its counsel, Karen O. Moury, and Buchanan Ingersoll & Rooney PC, files this Motion for Extension of Time to File Answer to Complaint, pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, and in connection therewith avers as follows:

1. Uber seeks an extension of time for filing an Answer to the Complaint in the above-captioned matter pending disposition of the Motion for Stay filed in this proceeding today. This extension is requested in the interests of judicial economy and administrative efficiency to permit the disposition by the Commission of the pending application proceeding initiated by Raiser-PA LLC, a wholly owned subsidiary of Uber, for authority to operate an experimental ridesharing network service in Allegheny County before adjudicating this Complaint. By filing the pending application and previously obtaining a statewide brokerage license, Uber has demonstrated a willingness to work with the Commission and the Commonwealth to fit its innovative technology-enabled ridesharing network services within an existing regulatory framework that was clearly not designed for these types of services. Importantly, Uber has also

shown a commitment to comply with or exceed the Commission's existing requirements relating to driver integrity, vehicle safety and liability insurance.

2. On June 5, 2014, the Bureau of Investigation and Enforcement ("I&E") filed a Complaint with the Commission alleging that Uber is acting as a broker of transportation without Commission authority. The Complaint seeks a civil penalty of \$95,000 and requests that Uber be directed to cease offering ridesharing passenger transportation service. The Complaint was served on Uber on June 6, 2014, and an Answer is due on June 26, 2014.

3. On June 18, 2014, Uber filed a Motion for Stay of the Complaint proceeding due to the pending application filed by Rasier-PA LLC ("Rasier"), a wholly owned subsidiary of Uber, at Docket No. A-2014-2416127 requesting the issuance of a certificate of public convenience to operate an experimental ridesharing network service between points in Allegheny County, Pennsylvania.

4. Rasier's application was published in the *Pennsylvania Bulletin* on April 26, 2014, with protests due by May 12, 2014. Protests have been filed to the application by the Insurance Federation of Pennsylvania ("Insurance Federation"), the Pennsylvania Association for Justice ("PAJ"), JB Taxi LLC, Executive Transportation, Inc. t/a Luxury Sedan, and Concord Limousine, Inc. Rasier has filed preliminary objections to the protests, and the application and protests are currently pending before the Office of Administrative Law Judge.

5. Either through the disposition of the preliminary objections or through negotiations with the protestants, Rasier is hopeful that the application will be able to move forward for Commission review within the next several weeks. Rasier is preparing an amended application to address the insurance concerns raised by some of the protests. Also, as noted in the application, Rasier plans to meet or exceed all Commission requirements relating to driver

integrity and vehicle safety. In addition, if the application becomes unopposed, Rasier stands ready and willing to cooperate with the Commission staff to address any remaining concerns with the objective of the application being approved by the Commission in the near future.

6. Given the procedural posture of Rasier's application at the Commission, judicial economy and administrative efficiency would be served by staying the present Complaint proceeding. Such a stay would give Uber the opportunity to resolve any remaining issues with Rasier's application so that the Commission may timely dispose of it, possibly alleviating the need for the Complaint proceeding to move forward.

7. Therefore, also in the interests of judicial economy and administrative efficiency, Uber requests an extension of time for filing an Answer to the Complaint until after the Motion for Stay is addressed.

WHEREFORE, for the foregoing reasons, Uber Technologies, Inc. respectfully requests that the Commission grant its Motion for Extension of Time to File Answer to Complaint.

Respectfully submitted,

Dated: June 18, 2014



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