

**Karen O. Moury**

717 237 4820  
karen.moury@bipc.com

409 North Second Street  
Suite 500  
Harrisburg, PA 17101-1357  
T 717 237 4800  
F 717 233 0852  
www.buchananingersoll.com

July 2, 2014

**VIA E-FILING**

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

Re: Application of Rasier-PA LLC, a Wholly Owned Subsidiary of Uber Technologies, Inc., for Emergency Temporary Authority to Operate an Experimental Ride-Sharing Network Service Between Points in Allegheny County, PA  
Docket No. A-2014-

Dear Secretary Chiavetta:

On behalf of Rasier-PA LLC, a wholly owned subsidiary of Uber Technologies, Inc., I have enclosed for electronic filing an Application for Emergency Temporary Authority to Operate an Experimental Ride-Sharing Network Service in the above-captioned matter. The filing fee of \$100.00 has been remitted through the eFiling system.

If you have any questions, please feel free to contact me.

Sincerely,

*Karen O. Moury / AMS*

Karen O. Moury

KOM/tlg  
Enclosure

cc: Chairman Robert F. Powelson  
Vice Chairman John F. Coleman  
Commissioner Pamela A. Wimer  
Commissioner Gladys M. Brown  
Commissioner James H. Cawley  
Jan H. Freeman, Executive Director  
Mary Beth Osborne, Director of Regulatory Affairs  
Paul Diskin, Director of Bureau of Technical Utility Services  
Bohdan R. Pankiw, Chief Counsel of Law Bureau

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Rasier-PA LLC, a Wholly	:	
Owned Subsidiary of Uber Technologies, Inc.,	:	
For Emergency Temporary Authority to Operate	:	Docket No. A-2014-
An Experimental Ride-Sharing Network Service	:	
Between Points in Allegheny County, PA	:	

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**APPLICATION FOR EMERGENCY TEMPORARY AUTHORITY**

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Rasier-PA LLC (“Rasier-PA”), by and through its counsel, Karen O. Moury and Buchanan Ingersoll & Rooney PC, files this Application for Emergency Temporary Authority (“ETA Application”) to operate an experimental ride-sharing network service between points in Allegheny County, Pennsylvania, pursuant to the Commission’s regulations at 52 Pa. Code §3.383(c), and in connection therewith avers as follows:

**I. Introduction**

1. It is beyond dispute that ridesharing network services fill significant gaps in the transportation infrastructure in Allegheny County. In short, as rider after rider will attest, Allegheny County needs Rasier-PA’s proposed service. Below are just two examples of riders touting this service.

*Sally G., Pittsburgh - 15201*

I have used Uber at least twice a week since it started in Pittsburgh. In February and March Uber drove me to and from the hospital safely so I could spend time with a close relative before they passed away. I would not have been able to take a bus or reliable cab in Pittsburgh to see my relative at the hospital. I cannot thank Uber enough for their wonderful service.

*Michael P., Pittsburgh – 15213*

I use the service every day to get to work and on weekends to get to parts of town that are otherwise a nightmare. Pittsburgh's cab infrastructure is a joke and the buses run on some arbitrary non-schedule, and the t lines are very limited and are completely, unsafely packed during peak times. Uber and lyft were godsend to this city. Not only day to day but absolutely I've called upon Uber to help my friends and myself out of

otherwise potentially dangerous situations, late at night and very early morning. Uber provides a valuable and much needed service to the people of this city. I really hope this can be resolved and the service can continue, as much for the folks that need it as well as for the jobs and much needed income it has provided for the drivers.

2. Rasier-PA is filing this ETA Application urging the Pennsylvania Public Utility Commission (“Commission”) to grant it permission to operate an experimental ride-sharing network service between points in Allegheny County, upon submission of proof of adequate liability insurance. This ETA Application is necessary due to the immediate need of the riding public in Allegheny County to be able to use an innovative game-changing technology that permits residents and visitors to access safe, economic and reliable transportation. Rasier-PA’s pending application before the Commission for authority to operate an experimental ride-sharing network service between points in Allegheny County is mired in an outdated and antiquated regulatory framework that allows existing businesses to keep new competitive services out of the market. Absent approval of this ETA Application, consumers in Allegheny County will be denied the benefits of customer choice, competition and economic growth.

## **II. Background**

3. On April 14, 2014, Rasier-PA filed an Application at Docket No. A-2014-2416127 requesting from the Commission the issuance of a certificate of public convenience evidencing approval to operate an experimental ride-sharing network service between points in Allegheny County, Pennsylvania (“Application”), pursuant to 52 Pa. Code § 29.352. Rasier-PA is a limited liability company with the Pennsylvania Department of State at Corporation Bureau Entity Identification Number 4262217.

4. Notice of Rasier-PA’s Application was published in the *Pennsylvania Bulletin* on April 26, 2014, with protests due by May 12, 2014. Protests were filed by the Insurance Federation of

Pennsylvania, the Pennsylvania Association of Justice, Concord Limousine, Inc., Executive Transportation, Inc., t/a Luxury Sedan and JB Taxi LLC t/a County Taxi Cab. The Application was referred to the Office of Administrative Law Judge (“OALJ”). Rasier-PA has filed preliminary objections challenging the standing of each of those protestants. Those preliminary objections are currently awaiting disposition by the OALJ.

5. Travis Kalanick is the Manager of Rasier-PA and the only member of the limited liability company.

6. Rasier-PA does not intend to utilize a trade name.

7. Rasier-PA’s physical address is:

122 Meyran Avenue  
Pittsburgh, PA 15213

8. Rasier-PA’s mailing address is:

182 Howard Street, #8  
San Francisco, CA 94105

9. Rasier-PA’s attorney is:

Karen O. Moury (PA ID No. 36879)  
Buchanan Ingersoll & Rooney PC  
409 North Second Street, Suite 500  
Harrisburg, PA 17101-1357  
Phone: 717-237-4820  
Fax: 717-233-0852  
Email: [karen.moury@bipc.com](mailto:karen.moury@bipc.com)

10. Rasier-PA does not hold intrastate operating authority.

### **III. Legal Standards Applicable to ETA Application**

11. Section 1103(d) of the Public Utility Code (“Code”), 66 Pa.C.S. § 1103(d), provides that the Commission may without hearing grant temporary certificates of public convenience in emergencies, pending action on permanent certificates.

12. Under regulations promulgated by the Commission pursuant to Code Section 1103(d), “a grant of ETA “shall be made upon the establishment of an immediate need for the transportation of passengers.” 52 Pa. Code § 3.384(b)(1). That provision further states that requests involving counties warrant approval when supported by evidence that there is a need for service to or from points in that county and that there is a reasonable certainty that the service will be used.

13. The Commission’s regulations further provide that a grant of Emergency Temporary Authority (“ETA”) will be made when it is established that there is or soon will be an immediate transportation need. Specifically, the regulations provide that a showing of immediate need may involve “the failure of existing carriers to provide service or comparable situations which require new carrier service before an application for permanent authority can be filed and processed.” 52 Pa. Code § 3.384(b)(2). The regulations further state that an “immediate need will not normally be found to exist when there are other carriers capable of rendering the service unless it is determined that there is a substantial benefit to be derived from the initiation of a competitive service.” *Id.*

14. In addition, the Commission’s regulations require an ETA application to contain specific information, including an explanation of the nature of the service and how it will be provided. 52 Pa. Code § 3.383(c)(3).

#### **IV. Discussion of Immediate Need**

15. No carriers currently hold a certificate of public convenience to provide experimental ride-sharing network service in Allegheny County. The Commission has conditionally approved one application in the matter of the *Application of Yellow Cab Company of Pittsburgh, Inc. t/a Yellow X*, Docket No. A-2014-2410269 (Order adopted May 20, 2014) (“*Yellow Cab Order*”). A

review of the Commission's docket entries indicates that the conditions have not yet been fulfilled and no certificate of public convenience has been issued.

16. Even if a certificate is issued to Yellow Cab during the pendency of this ETA Application, this is a classic situation when substantial benefit would be derived from the initiation of a competitive service. In the *Yellow Cab Order*, the Commission recognized that this type of new, innovative service qualifies as experimental service under the Commission's regulations and observed that the service allows for a wider ranging, faster and more user friendly scheduling of transportation services. In a Joint Statement accompanying adoption of the *Yellow Cab Order*, Commissioner Witmer and Commissioner Brown expressed their encouragement and excitement about the potential for this type of service throughout the Commonwealth. They described it as having the potential to revolutionize the transportation market and provide Pennsylvania customers with more options for travel. Welcoming different business models, Commissioner Witmer and Commissioner Brown noted their expectation that this type of service would thrive in Pennsylvania and provide great benefits to the riding public.

17. The City of Pittsburgh's Mayor William Peduto has specifically requested the Commission to permit innovative ridesharing services to fill the void that has not been met by existing taxicab and limousine companies operating in Pittsburgh. See: <http://www.post-gazette.com/business/2014/02/18/Peduto-asks-for-rule-change-on-ride-sharing-operations/stories/201402180175>. In addition, by letter dated July 1, 2014, which is attached as Exhibit A, Mayor Peduto noted the importance of attracting businesses and customers to Pittsburgh and highlighted the role that services such as those proposed by Rasier-PA play in innovation and economic growth.

18. In addition, Rasier-PA's proposed services are responsive to consumers who wish to have a choice about the way they are transported. For instance, the availability of the proposed services would allow riders to request transportation through the Internet or App rather than by a street-hail, which is an option that many riders find to be convenient and preferable to taxicab service.

19. Rasier-PA affiliates receive multiple requests daily for the proposed service, and Rasier-PA has no doubt that consumers will use the service if Rasier-PA's ETA Application is approved. Passengers who have used services offered by Rasier-PA affiliates in the past have submitted testimonials supporting the proposed service, which are attached as Exhibit B.<sup>1</sup>

20. Further, in the *Yellow Cab Order*, the Commission found that the proposed service was responsive to a public demand or need and stressed the importance of ensuring that the current regulatory structure is not a barrier to desirable changes in the transportation industry facilitated by advancements in technology. *Yellow Cab Order* at p. 6.

21. While the public need for the service proposed by Rasier-PA's ETA Application has been immediate since (and before) the filing of the Rasier-PA Application on April 14, 2014, other factors have colluded to provide an even greater urgency, resulting in the filing of this ETA Application.

22. The filing of the above-referenced protests to the Rasier-PA Application is one such factor triggering the need to request ETA. Specifically, the Rasier-PA Application has been protested by existing limousine and taxicab carriers under an antiquated and outdated process that discourages the introduction of competition into areas that are already served by such carriers. Rather than dismissing those protests due to their reliance on a set of regulations

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<sup>1</sup> Rasier-PA stands ready to provide such other information as the Commission may deem necessary for purposes of establishing immediate need and will supplement this application as appropriate.



designed to protest existing transportation providers, the Commission assigned them to the OALJ. Although Rasier-PA has filed preliminary objections requesting the dismissal of those protests on the basis of a lack of standing, which are currently awaiting disposition by the OALJ, Rasier-PA is aware that the OALJ has issued interim orders in a similar pending proceeding denying the preliminary objections even when the carrier has no authority to provide any type of service in Allegheny County. *See Application of Lyft, Inc.*, (“*Lyft Application*”) Docket No. A-2014-2415045 (*Interim Order on Preliminary Objections: JB Taxi LLC* issued on June 27, 2014).

23. The approach taken by OALJ in the *Lyft Application* proceeding is contrary to the Commission’s discussion in the *Yellow Cab Order* supporting the introduction of technology-enabled innovative services and the need to ensure that the current regulatory structure does not act as a barrier to such advancements. As the Commission emphasized in the *Yellow Cab Order*, the focus in these proceedings is on driver integrity and vehicle safety. Rasier-PA’s Application, as well as this ETA Application, contains sufficient information upon which to grant the requested authority.

24. The OALJ approach is also inconsistent with policies recently announced by the Commission about allowing the market to decide whether new household goods movers are needed in Pennsylvania and permitting new carriers to avoid a lengthy application process that considers the effect of new businesses on existing carriers. In a rulemaking order amending regulations applicable to the household goods industry, the Commission noted increased competition and concluded that there is no reason to protect existing carriers from the introduction of new services. By eliminating these outdated barriers to entry, the Commission emphasized the value of increased competition, consumer choice and job creation. *Final*



*Rulemaking Order Amending Regulations Applicable to Household Goods in Use Carriers and Property Carriers*, Docket No. L-2013-2376902 (Order adopted June 19, 2014). Those goals are equally applicable to the Rasier-PA's Application and Rasier-PA's ETA Application.

25. The other factor giving rise to a more urgent need for approval of the proposed service relates to enforcement proceedings recently initiated by the Commission's Bureau of Investigation and Enforcement ("I&E") against Uber Technologies, Inc., of which Rasier-PA is a wholly-owned subsidiary. On June 5, 2014, I&E filed a complaint at Docket No. C-2014-2422723 against UTI alleging that it was engaged in unlawful brokering of transportation services in Pennsylvania. UTI filed an answer to that complaint on June 26, 2014. The complaint is pending before OALJ. In connection with that complaint proceeding, I&E filed a Petition for Interim Emergency Relief at Docket No. P-2014-2426846 on June 16, 2014, seeking the issuance of a cease and desist order against UTI. An answer was filed to that petition on June 23, 2014 and an emergency hearing was held on June 26, 2014. On July 1, 2014, OALJ granted I&E's Petition for Interim Emergency Relief and certified the order as a material question to the Commission for review at the July 9, 2014 public meeting.

26. Although UTI has taken the position in those proceedings that it has not engaged in the unlawful brokering of transportation services, and has explained that it is a software company that licenses a smartphone application to entities who arrange transportation, those efforts have raised questions about the ability of UTI to continue licensing a product that allows passengers in Pittsburgh to be connected with available drivers in an efficient, economic and reliable manner. Those proceedings underscore the importance of the granting of Rasier-PA's ETA Application, not only for passengers but also for drivers who benefit from the opportunity to start and grow their own small businesses, which positively impacts economic growth.

**V. Description of Service**

27. Rasier-PA plans to use a digital platform to connect passengers to independent ride-sharing operators (“Operators”) with whom it will contract. Operators will use their personal, noncommercially licensed vehicles for the purpose of providing transportation services. Rasier-PA plans to license the UTI technology to generate leads from riders who need transportation services. Rasier-PA will not own vehicles, employ drivers or transport passengers.

28. Under this business model, riders will request transportation via UTI technology through the Internet or a mobile application (“App”) on their smartphones. When an Operator responds to the request, the rider will receive the vehicle type and a photo of the Operator, along an indication of the Operator’s current location and estimated time of arrival. Operators will not be permitted to solicit or accept street-hails.

29. Rasier-PA proposes to offer service at no-charge, suggest a donation or charge a fare; provided that if a fare is charged, Rasier-PA will disclose the fare calculation method, the applicable rates being charged and the option for an estimated fare to the passenger before booking the ride. Upon completion of a trip, an electronic receipt will be transmitted to the passenger’s email address or App documenting the details of the trip.

**VI. Insurance**

30. Rasier-PA will require Operators to provide proof of valid and current liability insurance on all vehicles used in offering ride-sharing services in at least the amounts specified in 75 Pa.C.S. §§ 1702 and 1711. This policy will cover Operators when they are not available through the App and are using their vehicles for personal reasons.

31. Rasier-PA will submit to the Commission proof of adequate insurance evidencing policies and coverage that comply with and exceed the minimum standards required by the Commission at 52 Pa. Code §§ 32.11 and 41.21, as follows<sup>2</sup>:

- a. **\$1 million of liability coverage per incident.** Rasier-PA will maintain liability insurance in the amount of \$1 million to cover liability for bodily injury, death or property damage, which far exceeds the Commission's minimum requirement of \$35,000. Although the liability insurance policy is described as "excess," the terms and conditions will clearly provide that this coverage will cover the Operator's liability from the time the Operator accepts a trip request through the App until the completion of a trip. It will include first party medical benefits in the amount of \$25,000 and first party wage loss benefits in the amount of \$10,000 for passengers and pedestrians.
- b. **\$1 million of uninsured/underinsured motorist coverage per incident.** Rasier-PA will maintain uninsured/underinsured motorist coverage of \$1 million per incident, which will apply if another motorist causes an accident with an Operator's vehicle and does not carry adequate insurance. This is important to ensure that passengers are protected in a hit and run situation.
- c. **\$50,000/\$100,000/\$25,000 of contingent coverage between trips.** During the time that an Operator is available but between trips, most personal liability insurance will provide coverage. However, if the personal policy completely declines or pays zero, the Operator will be backed up by an additional policy that covers liability for bodily injury up to \$50,000/individual/accident with a total of \$100,000/accident and up to \$25,000 for property damage.

## **VII. Driver Integrity**

32. Rasier-PA will require Operators to meet standards that are consistent with and significantly more stringent than the Commission's requirements set forth in 52 Pa. Code §§ 29.502-29.507, as described more fully below:

- a. *Criminal Background Checks.* Rasier-PA will conduct a local and national criminal background check that includes the Multi-State/Juris Criminal Records Locator and the National

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<sup>2</sup> Rasier-PA is aware of the provision in the ETA regulations at 52 Pa. Code § 3.83(c)(3)(G) requiring the submission of evidence of insurance with an ETA application, and specifically requests a waiver of that provision, with the expectation that if the Commission grants the ETA Application, it will do so conditionally subject to the submission of evidence of insurance acceptable to the Commission.

Sex Offender Registry database on each Operator before the Operator may access the digital platform to receive requests for transportation. A match on the national sex offender registry or a conviction that appears on a criminal background check within the past 7 years for crimes of violence, sexual abuse, felony, robbery, or felony fraud, shall automatically and permanently disqualify an individual from acting as an Operator.

b. *Driving History Record.* Rasier-PA will have a driving history record conducted on each Operator before the Operator may offer service. A conviction that appears on a driving history check within the past 7 years for aggravated reckless driving, driving under the influence of drugs or alcohol, hit and run, attempting to evade the police, or the use of a motor vehicle to commit a crime, or a conviction that appears on a driving history check in the previous 3 years for driving with a suspended or revoked license, shall automatically disqualify an individual from acting as an Operator.

c. *Drugs or Alcohol.* Rasier-PA will have a zero tolerance policy on the use of drugs or alcohol while an Operator is providing ride-sharing services. Notice of this zero tolerance policy is on both the Rasier-PA and UTI websites, along with procedures to report a complaint, including a Commission telephone number for passengers to call when they reasonably suspect an Operator was under the influence of drugs or alcohol during the course of the ride. Rasier-PA will immediately suspend an Operator upon receipt of a passenger complaint alleging a violation of the zero tolerance policy, and such suspension will last the duration of Rasier-PA's investigation.

d. *Other Driver Requirements.* Operators will be required to possess a current, valid driver's license, proof of registration, proof of motor vehicle insurance and be at least 21 years of age.

### **VIII. Vehicle Safety**

33. Rasier-PA will require Operators' vehicles to meet standards that are consistent with the Commission's requirements, particularly as to safety, as more fully described below:

a. *Inspections.* Rasier-PA will require vehicles operated by Operators to undergo and pass an annual and comprehensive safety inspection before the vehicle provides a ride-sharing service, which is consistent with the Commission's requirements at 52 Pa. Code §§ 29.402 and 29.405. Such inspections must be performed by an official inspection station and comply with Pennsylvania vehicle laws and regulations at 75 Pa. C.S. Chapter 47 and 67 Pa. Code §§ 175.61-175.80, including but not limited to suspension and steering components; braking systems; tires and wheels; lighting and electrical systems; and horns and warning devices. Additionally, Rasier-PA acknowledges that vehicles are subject to inspection by Commission enforcement officers through routine inspections to ensure compliance with these requirements.

b. *Vehicle Age and Type.* Operators contracted by Rasier-PA will be required to use motor vehicles that are not more than 10 years old and are designed to transport no more than 10 persons, including the driver. Eligible vehicles include street-legal coupes, sedans, or light duty vehicles including vans, minivans, sport utility vehicles, hatchbacks, convertibles and pickup trucks.

c. *Other Vehicle Requirements.* Vehicles will be required to be in a condition that meets or exceeds the standards set forth in 52 Pa. Code § 29.403, including seats in working order; vehicles in clean and sanitary condition; factory type heaters in working order; clean trunk compartments suitable for carrying luggage; exteriors free of large dents or gouges; four matching wheel covers; and operative air conditioning.

**IX. Other Requirements**

34. Rasier-PA will maintain a website that provides a customer service telephone number or email address.

35. Rasier-PA will maintain records to demonstrate compliance with all of the requirements, standards and obligations described in this ETA Application.

36. Rasier-PA understands that it is subject to an annual assessment based upon reported gross Pennsylvania intrastate revenues, which will be handled through delegation to a third party to interface with the Commission.

37. Rasier-PA further understands that it has sole responsibility to address Commission-related passenger complaints and that a failure to adhere to the commitments made in this ETA Application may result in the Commission imposing sanctions, including civil penalties, suspension and revocation of the certificate of public convenience.

38. Rasier-PA is not currently engaged in unauthorized intrastate transportation for compensation between points in Pennsylvania and will not engage in such transportation unless and until such authorization is received from the Commission.

39. While Rasier-PA has sought to comply with the key provisions of the regulations governing the filing and disposition of ETA applications at 52 Pa. Code §§ 3.383-3.384, it is requested that the Commission exercise its discretion to grant waivers of any specific provisions that may not be fully satisfied due to their inapplicability to an ETA application that is filed within the context of an Application for approval to offer experimental ridesharing network services. *See Township of Collier v. Pennsylvania American Water Company*, Docket No. C-20016207, 2004 Pa. PUC LEXIS 26 (2004) (Commonwealth agency may waive its own regulations).

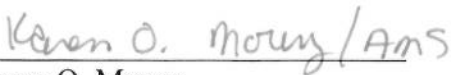
40. Granting the ETA Application, conditioned upon submitting acceptable evidence of insurance, will allow Rasier-PA to offer passengers in Allegheny County an innovative and unique service for which they are clamoring under the oversight of the Commission that is designed to ensure driver integrity, vehicle safety and adequate liability insurance.

**X. Conclusion**

Rasier-PA LLC requests that the Commission approve the Application for Emergency Temporary Authority to operate an experimental ridesharing network service between points in Allegheny County, Pennsylvania and grant Rasier-PA LLC such other relief as is just and reasonable under the circumstances.

Respectfully submitted,

Dated July 2, 2014

  
Karen O. Moury  
Buchanan Ingersoll & Rooney PC  
409 North Second Street  
Suite 500  
Harrisburg, PA 17101  
(717) 237-4820

*Attorneys for Rasier-PA LLC*



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### **Verification**

I hereby verify that the statements made in this application are true and correct to the best of my knowledge and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Uber Technologies, Inc.  
Krishna K. Juvvadi, Senior Counsel



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July 2, 2014

## Exhibit A



# CITY OF PITTSBURGH

"AMERICA'S MOST LIVABLE CITY"

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July 1, 2014

Mary D. Long  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
301 5th Avenue  
Suite 220  
Pittsburgh, Pennsylvania 15222

Jeffrey A. Watson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
301 5th Avenue  
Suite 220  
Pittsburgh, Pennsylvania 15222

Re: Docket No. P-2014-2426846  
Docket No. P-2014-2426847

Judge Long and Judge Watson:

I write this letter in support of pending efforts by the companies Lyft and Uber to receive approvals to operate experimental transportation services in the state of Pennsylvania, and in opposition to the Petition for Interim Emergency Relief filed by the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission.

This is a time of change and opportunity in the Commonwealth. The shared fiscal health of Pennsylvania and its second-biggest city, Pittsburgh, is growing better partly because of our common interest in attracting innovative businesses and the customers to which they cater. It is not the time to stop that momentum.

As the executive ultimately in charge of Pittsburgh's public safety bureaus I understand and share the PUC's concerns with safety for operators and passengers. That is why I support giving interim approvals to these fledgling businesses which would require PUC regulation and oversight, while also allowing them to grow.

512 CITY-COUNTY BUILDING, 414 GRANT STREET, PITTSBURGH, PENNSYLVANIA 15219

Phone: 412-255-2626 Fax: 412-255-2687



[pittsburghpa.gov](http://pittsburghpa.gov)

[facebook.com/TheNextPGH](https://www.facebook.com/TheNextPGH)

[@TheNextPGH](https://twitter.com/TheNextPGH)

[TheNextPittsburgh](https://www.youtube.com/user/TheNextPittsburgh)



# CITY OF PITTSBURGH

"AMERICA'S MOST LIVABLE CITY"

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The actions sought by the Bureau of Investigation and Enforcement against these entrepreneurs would threaten these businesses and remove transportation options enjoyed by hundreds in my city. In addition, they are unnecessarily spreading fear in the customer base in ways that could threaten future innovation.

Those are not the messages this Commonwealth should be sending. I have been clear to leaders of the PUC -- and I will repeat again -- that the role of government is to facilitate innovation and growth, not to stand in its way.

Uber is reporting that ridership in Pittsburgh is growing faster here than in any other city where their service is available. I myself use Lyft and Uber frequently and have been quite pleased with both the level of service that I have received and the comfort and safety I have enjoyed while in the care of their drivers.

Other states have embraced these services by adopting new methods to allow them to operate legally and safely. California and Colorado are just two examples of governments that have successfully tackled this problem. If they can do it, I know we can too.

I urge you to reject the Bureau of Investigation and Enforcement petition and allow companies such as Uber, Lyft -- and many others like them in the future -- to grow.

Sincerely,

William Peduto  
Mayor



## Exhibit B

## **EXAMPLES OF TESTIMONIALS OF PASSENGERS**

It is beyond dispute that ridesharing fills significant gaps in the transportation infrastructure. In short, as rider after rider will attest to, Allegheny County needs ridesharing:

**1. Sally G., Pittsburgh - 15201**

I have used Uber at least twice a week since it started in Pittsburgh. In February and March Uber drove me to and from the hospital safely so I could spend time with a close relative before they passed away. I would not have been able to take a bus or reliable cab in Pittsburgh to see my relative at the hospital. I cannot thank Uber enough for their wonderful service.

**2. Michael P., Pittsburgh - 15213**

I use the service every day to get to work and on weekends to get to parts of town that are otherwise a nightmare. Pittsburgh's cab infrastructure is a joke and the buses run on some arbitrary non-schedule, and the t lines are very limited and are completely, unsafely packed during peak times. Uber and Lyft were godsend to this city.

Not only day to day but absolutely I've called upon Uber to help my friends and myself out of otherwise potentially dangerous situations, late at night and very early morning. Uber provides a valuable and much needed service to the people of this city. I really hope this can be resolved and the service can continue, as much for the folks that need it as well as for the jobs and much needed income it has provided for the drivers.

**3. Diane N., Pittsburgh - 15208**

I use Uber to quickly and safely get me to where I need to be, especially when the buses run every hour and are always late.

**4. Takiva P., Pittsburgh - 15233**

I've been in cabs where I've gotten verbally berated for rides under \$10 when that's not an explicit policy, or had cabbies try to verbally bully me into taking longer rides. The buses are incredibly inefficient taking me 45 minutes to travel 5 miles.

If the cab and bus service are the best that Pittsburgh has to offer, it'll be the main thing driving me out of here as that is not the Pittsburgh I want to experience. The friendliness, local knowledge, and reliability that comes with Uber, by helping make Pittsburgh seem less isolated and lonely and maybe helping keep me here as a transplant, that is the Pittsburgh I want to continue to experience.

**5. Anthony, M., Pittsburgh - 15233**

I do not own a car, and because I have short windows sometimes to get to and from my job in Oakland and other neighborhoods, I have come to rely on Uber and use the service almost everyday. It's impossible to do this with the other taxi services, as they are unreliable and certainly less affordable. I can say absolutely that not having this great service will affect my life in a very negative way.

6. Sivram B., Pittsburgh - 15222

Uber has made travel so easy. I used to be scared to go somewhere wondering if i will ever make it back home. If helps business around the city profitable, gets people anywhere they want without worrying. Theres only a hand full of yellow cabs, i have waited numerous times for 4 hours for a yellow cab and no one cared to show up. Please let ride share stay in Pittsburgh.

7. Zia M., Pittsburgh - 15204

Because of Uber I have a safe, low cost, RELIABLE way home after a night out. It takes the stress out of getting in the car with a potential drunk driver or risking the drive myself.

8. Sundus S., Pittsburgh - 15213

Uber has always been there when the dismal bus system leaves us stranded in various places. I have used it to catch a flight out, when the yellow taxi cab didn't show up. It is an excellent means of transport to get us girls safely home, especially at night.