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July 21, 2014

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

**VIA ELECTRONIC FILING**

**Re: Application of Lyft, Inc. (Experimental Service in Pennsylvania);  
A-2014-2415047**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Objection of Lyft, Inc. to MTR Transportation, Inc., t/d/b/a K-Cab Co., and Billtown Cab Co., Inc's First Set of Interrogatories in the above-captioned proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', is written over a horizontal line.

Adeolu A. Bakare

Counsel to Lyft, Inc.

/emp  
Enclosure

c: Certificate of Service

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

**VIA E-MAIL AND FIRST-CLASS MAIL**

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**VIA FIRST-CLASS MAIL**

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Pauls Cab Service Inc.  
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\_\_\_\_\_  
Adeolu A. Bakare

Counsel to Lyft, Inc.

Dated this 21st day of July, 2014, in Harrisburg, Pennsylvania.

APPLICATION OF LYFT, INC.

Docket No. A-2014-2415047

OBJECTION OF LYFT, INC. TO  
MTR TRANSPORTATION, INC., T/D/B/A K-CAB CO.,  
AND BILTOWN CAB CO., INC. FIRST SET OF INTERROGATORIES

Pursuant to 52 Pa. Code §§ 5.342 and 5.349, Lyft, Inc. objects to Request Nos. 7 and 8 propounded by MTR Transportation, Inc. t/d/b/a K-Cab Co. and Biltown Cab. Co. ("Protestants") as follows:

**Q.8** If your answer to Interrogatory No. 7 is yes, please identify each such public utility commission or the public service commission and state the facts or allegations upon which each such citation or complaint (formal or informal) was based and its final disposition.

**OBJECTION:** The City objects to Interrogatory Q.8 on the basis that the request is unduly burdensome and would require the making of any unreasonable investigation. The request would require Lyft to review its entire history of regulatory compliance in over 30 jurisdictions and produce individualized reports for each applicable regulator. The request is overbroad, with no limitation to particular issues or even a specified timeframe.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By



James P. Dougherty (Pa. I.D. 59454)

Adeolu A. Bakare (Pa. I.D. 208541)

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Counsel to Lyft, Inc.

Dated: July 21, 2014