



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166
Tel: 717.232.8000 • Fax: 717.237.5300

Adeolu A. Bakare
Direct Dial: 717.237.5290
Direct Fax: 717.260.1744
abakare@mwn.com

July 23, 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 Prehearing Memorandum of Lyft, Inc. 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 
Adeolu A. Bakare

Counsel to Lyft, Inc.

/lmc
Enclosure

c:c: Administrative Law Judge Mary D. Long (via e-mail and First-Class Mail)
Administrative Law Judge Jeffrey A. Watson (via e-mail and First-Class Mail)
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

Lloyd R. Persun, Esq.
Persun and Heim, P.C.
MTR TRANS INC & BILLTOWN CAB
P.O. Box 659
Mechanicsburg, PA 17055-0659
pagelbaugh@persunheim.com

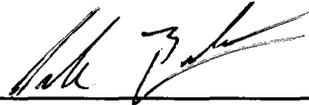
Michael S Henry, Esq.
Michael S. Henry LLC
2336 S. Broad Street
Philadelphia, PA 19145
mshenry@ix.netcom.com

David William Donley, Esq.
JB Taxi LLC t/a County Taxi Cab
3361 Stafford Street
Pittsburgh, PA 15204
dwdonley@chasdonley.com

VIA FIRST-CLASS MAIL

Dennis G. Weldon Jr, Esq.
Bryan L. Heulitt Jr., Esq.
Philadelphia Parking Authority
701 Market Street, Suite 5400
Philadelphia, PA 19106

Carl W. Hovenstine
Vice President
Pauls Cab Service Inc.
735 Market Street
Sunbury, PA 17801



Adeolu A. Bakare

Counsel to Lyft, Inc.

Dated this 23rd day of July, 2014, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In Re: Applications of Lyft, Inc.	:	Docket No. A-2014-2415047
	:	Docket No. A-2014-2415045

PREHEARING MEMORANDUM OF LYFT, INC.

Lyft, Inc. ("Lyft" or "Applicant") hereby submits this Prehearing Conference Memorandum in the above-captioned proceeding pursuant to 52 Pa. Code § 5.222.

I. HISTORY OF THE PROCEEDING

On April 3, 2014, Lyft filed Applications at Docket Nos. A-2014-2415045 ("Allegheny County Application") and A-2014-2415047 ("Statewide Application") requesting the issuance of a certificate of public convenience to operate an experimental transportation network service platform between points in Allegheny County, Pennsylvania and throughout the Commonwealth, respectively.

The Application was published in the Pennsylvania Bulletin on April 19, 2014, with Petitions to Intervene and Protests due on May 5, 2014. Applicant filed Preliminary Objections to Protests on May 27, 2014. Between June 24 and June 27, 2014, Administrative Law Judges Mary D. Long and Jeffrey A. Watson issued Interim Orders and Initial Decisions addressing Applicant's Preliminary Objections. The Initial Decisions dismissed protests filed by the Insurance Federation of Pennsylvania, the Pennsylvania Association for Justice, Concord Limousine, Five Star Limousine, and Shamokin Cab. Co. Additionally, the ALJs issued an Interim Order directing Paul's Cab Co. to cure a defective protest within 10 days. As Paul's Cab has failed to cure the defective protest, its Protest should be dismissed as a matter of law.

Following issuance of the Interim Orders and Initial Decisions addressing parties' pleadings, the ALJs distributed a Notice of Prehearing Conference on July 3, 2014. The Notice directed parties to participate in a telephonic Prehearing Conference to be held on July 24, 2014. The ALJs subsequently served parties with a Prehearing Conference Order on July 7, 2014, which directed parties to prepare Prehearing Conference Memoranda for submission to the ALJs on or before July 23, 2014. Pursuant to the requirements of the Prehearing Conference Order, Lyft hereby submits this Prehearing Conference Memorandum.

II. ANTICIPATED ISSUES AND SUB-ISSUES

Lyft will submit evidence in support of its Applications to offer efficient, safe, and modern experimental transportation network service in Allegheny County and the Commonwealth of Pennsylvania. To that end, Lyft will submit evidence of its fitness to offer experimental service and its firm intent to comply with the Commission's Regulations relating to liability insurance. In particular, Lyft will detail changes made to its insurance policies to specifically meet or exceed the minimum requirements under the Commission's Regulations. Lyft will further revise statements in its Application regarding vehicle safety as necessary to confirm that Lyft will submit to the Commission's vehicle inspection authority. Finally, Lyft will address its policies regarding driver safety. To the extent necessary, Lyft will explain the unique benefits of transportation network service and distinguish its functionality and technological advantages from traditional transportation services. In addition to supporting and updating the averments in its Application, Lyft reserves the right to raise further issues as may become necessary and to respond to all issues raised by other parties.

III. PROPOSED WITNESSES

The Companies will present the following witness to testify on the issues set forth above and more specifically reflected below:

Joseph Okpaku, Director of Public Policy, Lyft Inc.

- Compliance with PUC Insurance Regulations
- Compliance with PUC Vehicle Safety Regulations
- Financial Fitness
- Compliance with PUC Driver Safety Regulations
- Additional internal safety policies

IV. PROPOSED SCHEDULE AND DISCOVERY RULES

Consistent with the ALJs' request to hold hearings during the first two weeks of August and conclude briefing by August 29, Lyft, proposes the following procedural schedule:

Hearings – August 14, 2014 (Harrisburg, PA)

Briefs – August 29, 2014

Lyft does not anticipate propounding discovery upon other parties to the proceeding and therefore does not propose modifications to the Commission's discovery rules.

V. OTHER ISSUES/SPECIAL MATTERS

Lyft does not have any other issues or special matters at this time, but reserves the right to address any issues not specifically set forth above as may become necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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

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

Barbara A. Darkes (I.D. No. 77419)

McNees Wallace & Nurick LLC

100 Pine Street

P.O. Box 1166

Harrisburg, PA 17108-1166

Phone: 717.232.8000

Fax: 717.237.5300

jdougherty@mwn.com

abakare@mwn.com

bdarkes@mwn.com

Counsel to Lyft, Inc.

Dated: July 23, 2014