

The Insurance Federation of Pennsylvania, Inc.

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Samuel R. Marshall
President & CEO

August 25, 2014

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

VIA ELECTRONIC FILING

Re: Application of Lyft, Inc.;
A-2014-2415045
A-2014-2415047

Dear Secretary Chiavetta:

Enclosed for filing are Interrogatories and Request for Production of Documents Addressed to the Applicant in the above-captioned matters.

Copies have been served on all parties as indicated in the attached Certificate of Service.

Sincerely,



Samuel R. Marshall

C: Administrative Law Judges Mary D. Long and Jeffrey Watson (via electronic delivery)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Lfyt, Inc. : Docket No. A-2014-2415045
: Docket No. A-2014-2415047

**INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
ADDRESSED TO THE APPLICANT**

The Insurance Federation of Pennsylvania, Inc. ("Insurance Federation"), pursuant to 52 Pa.Code Section 5.321 et seq., submits the following Interrogatories and Request for Production of Documents to Lyft, Inc. ("the Applicant") and demands the Applicant file and serve full and complete written answers to each Interrogatory and Request under oath within five (5) days after the date of service hereof. These interrogatories and requests shall be of a continuing nature with the understanding that it shall be the responsibility of the Applicant to furnish updated responses up to and including the time at which the hearing on the merits of these cases is held.

Interrogatories

1. Please admit or deny that the Applicant proposes to satisfy 52 Pa.Code Sections 32.11(a) and (b) and 41.21 and 52 Pa.Code Section 3.381(e), regarding insurance coverage and proof of insurance coverage, as set

forth by the Applicant in Section IV(A)(6) of Attachment A of its Applications filed with the Commission on April 3, 2014.

2. If the preceding Interrogatory is not admitted without qualification, please set forth any changes the Applicant proposes to satisfy 52 Pa.Code Sections 32.11(a) and (b) and 41.21 and 52 Pa.Code Section 3.381(e), regarding insurance coverage and proof of insurance coverage.

3. If changes are set forth in the answer to the preceding Interrogatory, please identify any documents or other sources setting forth such changes, including any revisions to the Applications and any materials related to the insurance coverage the Applicant proposes, including but not limited to any proposed Form E and any insurance policies identified in that form.

4. Please admit or deny that the Applicant proposes to direct all of its operators and drivers to notify their personal auto insurers, in writing, of their intent to operate in Applicant's service.

5. If the preceding Interrogatory is admitted, please admit or deny that the Applicant proposes to maintain copies of its operators' and drivers' notifications to their personal auto insurers during their affiliation with the Applicant and for a period of three (3) years following termination of their affiliation and service.

6. Please admit or deny that the Applicant proposes to notify its operators and drivers, in writing, whether it is providing comprehensive and collision coverage during their service and affiliation with the Applicant.

7. If the preceding Interrogatory is admitted, please admit or deny that the Applicant proposes to maintain a copy of each notification for a period of three (3) years following termination of its operators' and drivers' affiliation and service.

8. If Interrogatories 4 through 8 are admitted, please identify any documents or other sources setting forth the manner in which the Applicant proposes to perform the actions set forth therein, including any revisions to the Applications.

Request for Production of Documents

1. Please produce all documents or other sources identified in your Answer to Interrogatory 3.
2. Please produce all documents or other sources related to terms and conditions between the Applicant and its operators and drivers pertaining to the insurance the Applicant requires of its operators and drivers and the insurance it proposes to provide to its operators and drivers.
3. Please produce all documents or other sources identified in your Answer to Interrogatory 8.

Respectfully submitted,



Samuel R. Marshall (PA ID No. 33619)
President and CEO
Insurance Federation of Pennsylvania, Inc.
17th Floor
1600 Market Street
Philadelphia, PA 19103

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via First Class Mail and electronic as designated

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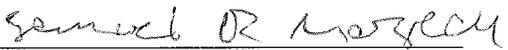
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A-2014-2415047

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Samuel R. Marshall
Insurance Federation of Pennsylvania

Dated this 25th day of August, 2014, in Philadelphia, Pennsylvania