

The Insurance Federation of Pennsylvania, Inc.

1600 Market Street
Suite 1720
Philadelphia, PA 19103
Tel: (215) 665-0500 Fax: (215) 665-0540
E-mail: smarshall@ifpenn.org

Samuel R. Marshall
President & CEO

August 29, 2014

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

VIA ELECTRONIC FILING

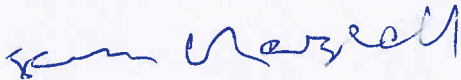
Re: Application of Lyft, Inc.;
A-2014-2415045
A-2014-2415047

Dear Secretary Chiavetta:

Enclosed for filing is the Answer to the Applicant's Petition for Protective Order filed today.

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 Lyft, Inc. : Docket No. A-2014-2415045
: Docket No. A-2014-2415047

**ANSWER TO THE AUGUST 29, 2014 PETITION FOR PROTECTIVE ORDER
FILED BY LYFT, INC. IN RESPONSE TO THE INSURANCE FEDERATION'S
INTERROGATORIES AND REQUEST FOR DOCUMENTS**

The Insurance Federation of Pennsylvania, Inc. ("Insurance Federation"),
answers the Petition for Protective Order filed by Lyft, Inc. ("the Applicant") on
August 29, 2014.

1. Admitted.
2. The Insurance Federation was not a party to this proceeding at the time of the Interim Order and is therefore without sufficient knowledge on the issues therein.
3. The Insurance Federation was not a party to this proceeding at the time of the Interim Order and is therefore without sufficient knowledge on the issues therein.
4. The Insurance Federation objects to extending the Applicant's proposed Protective Order to the insurance policies and proposed Form E it purports

to have developed with its insurer to ensure public safety. The Applicant states these policies – apparently five in total, with separate policies for separate benefits – are “specifically tailored to its unique service” and that public disclosure would provide an advantage to its competitors. The uniqueness of its service and, based on this Petition, the uniqueness of its insurance policies designed to protect public safety and satisfy the Commission’s requirements, justify inspection by the public being protected. To the extent any portions of the insurance policies are confidential, they can be redacted while still allowing public inspection of the terms and conditions of the policies.

5. The Insurance Federation objects to the Applicant’s characterization of the insurance policies it proposes to provide to satisfy the PUC’s insurance requirements as being irrelevant to the Commission’s review of its Application and whether it satisfies the insurance requisites of the PUC’s regulations. Given the uniqueness of its service and the uniqueness of its insurance policies, relying solely on the Applicant’s Form E to ascertain whether the Applicant has complied with the Commission’s insurance requirements is insufficient. Even if the insurance policies are as purported in the Form E, and even if their terms would be revised to match the insurance requirements of the Commission, public inspection of them is relevant. It goes to the potential challenges and claims under them, and

to a proper understanding of the insurance requirements of the Commission.

6. The Insurance Federation objects to the Applicant seeking protective status for not only its insurance policies but its proposed Form E.
7. The Insurance Federation objects to the entry of the proposed Protective Order consistent with the foregoing.

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-2014-2415045
: 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

Adeolu A. Bakare, Esq.
McNees, Wallace & Nurick, LLC
100 Pine Street
Harrisburg, PA 17108
(e-service, too)

David William Donley, Esq.
JB Taxi LLC t/a County Taxi Cab
3361 Stafford Street
Pittsburgh, PA 15204
(e-service, too)

Paul S. Guarnieri, Esq.
Ray Middleman, Esq.
Malone Middleman, PC
Pennsylvania Association for Justice
Wexford Professional Building III
11676 Perry Highway, Suite 3100
Wexford, PA 15090
(e-service, too)

Michael S. Henry, Esq.
Michael S. Henry LLC
Concord Limousine, Black Tie Limousine,
Executive Transportation Inc
2336 S. Broad Street
Philadelphia, PA 19145
(e-service, too)

Lloyd R. Persun, Esq.
Persun and Heim, P.C.
MTR TRANS INC & BILLTOWN CAB
P.O. Box 659
Mechanicsburg, PA 17055-0659
(e-service, too)

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

(e-service, too)

A-2014-2415047

A handwritten signature in blue ink that reads "Samuel R. Marshall". The signature is written in a cursive style and is positioned above a horizontal line.

Samuel R. Marshall
Insurance Federation of Pennsylvania

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