



A TRANSPORTATION MANAGEMENT ASSOCIATION

Advocacy
Sustainability
Partnerships

August 26, 2014

Robert F. Powelson, Chairman
PA Public Utility Commission
PO Box 3265
3rd Floor, Room N-304
Harrisburg, PA 17105-3265

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CHAIRMAN'S OFFICE

Dear Chairman Powelson:

As a not-for-profit organization created to advocate and promote a viable transportation network for the region's economic vitality, I am writing on behalf of GVF's board of directors and its over 130 public-private partners, to express concerns in response to the Transportation Network Companies (TNC), such as Uber and Lyft.

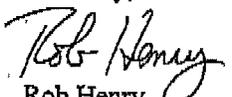
Specifically, we are concerned by what we consider to be unclear use with the Commission using the term "ridesharing" to describe the "peer-to-peer taxi services". We are also concerned that the definition of TNCs unintentionally includes carpooling and vanpooling services, which have a long and notable history as being viewed as non-commercial transportation services.

While we believe that it is the intent to continue to exclude ridesharing from a TNC, we believe that exemption should be highlighted within the ruling and the definition of ridesharing be fleshed out to differentiate the models used by TNCs versus the models used by ridesharing programs. Additionally, the technologies used by ridesharing and TNCs may be similar, but the models and usage differ. This differentiation should be a basis and finding of this ruling.

In conclusion, GVF requests that the definition of a TNC explicitly exempt ridesharing and that ridesharing entities are not considered a TNC and TNCs are not considered ridesharing. We would further urge that the definition of ridesharing is one that provides transportation of persons between home and work locations or of persons having a common work-related trip in a vehicle having a seating capacity of 15 passengers or less, including the driver. This exemption does not apply if the primary purpose for the transportation of those persons operating the vehicle is to make a profit. However, shared costs and cost recovery for common work-related trips are allowed.

If you should have any questions, please do not hesitate to contact me at 610-354-8899. Thank you for your attention to this important matter.

Sincerely,


Rob Henry
Executive Director