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September 11, 2014

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

**VIA ELECTRONIC FILING**

**RE: Lyft, Inc. Testimony  
En Banc Transportation Hearing; Docket No.: M-2014-2431451**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission are the Comments of Lyft, Inc. in the above-captioned proceeding.

If you have any questions, please contact the undersigned. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By

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

Adeolu A. Bakare

Counsel to Lyft, Inc.

/lmc  
Enclosures

cc: Bohdan R. Pankiw, Law Bureau Chief Counsel (via e-mail)  
Eric A. Rohrbaugh, Law Bureau (via e-mail)  
John Herzog, Law Bureau (via e-mail)  
Jan H. Freeman, Executive Director (via e-mail)  
Mary Beth Osborne, Director of Regulatory Affairs (via e-mail)

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

En Banc Transportation Hearing

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Docket No. M-2014-2431451

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**COMMENTS OF LYFT, INC.**

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Counsel to Lyft, Inc.

Dated: September 11, 2014

## **I. INTRODUCTION**

On August 28, 2014, the Pennsylvania Public Utility Commission ("PUC" or "Commission") hosted an *en banc* hearing seeking testimony regarding transportation industry issues. The hearing focused on: (1) current issues in the transportation industry and (2) whether the Commission's transportation regulations should be updated to address these issues. Of particular interest to Lyft, Inc. ("Lyft" or "Company") was the hearing's focus on rules for Transportation Network Companies ("TNCs"). Lyft submitted written testimony on August 21, 2014 and Katie Kincaid provided live testimony before the Commission on August 28, 2014 explaining Lyft's various interests in the instant proceeding.

Lyft is a Delaware corporation headquartered in California but registered with the Pennsylvania Department of State. Lyft currently operates in Allegheny County under a Certificate of Public Convenience granting Emergency Temporary Authority to offer experimental service. Lyft also has Applications for Experimental Service pending with the Commission that would allow Lyft to permanently provide service in Allegheny County and throughout most of Pennsylvania.

Lyft is a TNC, which refers to a company offering a software application that allows individuals seeking transportation to connect with qualified drivers. This is an innovative form of prearranged transportation accessible through a mobile software application on a smart phone. As a TNC, Lyft has a significant interest in the outcome of this proceeding as the Commission is considering updating its regulations to add rules for TNCs.

## **II. COMMENTS**

Lyft appreciates the Commission allowing the Company to comment in this proceeding. Lyft does not have any further substantive comments at this time other than to briefly review the

Company's concerns and inform the Commission and other interested parties that the Company will continue to be available and willing to further discuss these important regulatory matters.

Further, Lyft would like to reiterate the importance of TNC-specific consideration of insurance requirements, TNC driver qualifications, TNC vehicle parameters, TNC pricing models, industry competition, and the need for TNC service in Pennsylvania. Lyft agrees with the Commission that each of these must be properly addressed to the benefit of the public, but cautions that the solutions should reflect informed consideration of the specific characteristics of TNC services. Lyft is willing to further discuss these issues or any other issues in the instant proceeding that the Commission or other interested parties wish to discuss.

Finally, Lyft requests that the Commission allow parties to file reply comments in this proceeding. Reply comments will give parties an opportunity to respond to filed comments and will help to ensure that the Commission has a complete record in this proceeding. More information and a more complete record will be beneficial to the Commission as it considers updating its transportation regulations, especially as they concern TNC rules.

**III. CONCLUSION**

**WHEREFORE**, Lyft, Inc. respectfully requests that the Pennsylvania Public Utility Commission accept Lyft's Comments and permit reply comments, if necessary, in the instant proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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