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September 23, 2014

VIA E-FILING

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

Re: Application of Rasier-PA LLC, a Wholly Owned Subsidiary of Uber Technologies, Inc., for Emergency Temporary Authority to Operate an Experimental Ride-Sharing Network Service Between Points in Allegheny County, PA
Docket No. A-2014-2429993

Dear Secretary Chiavetta:

On behalf of Rasier-PA LLC, I have enclosed for electronic filing the Petition of Rasier-PA LLC for Extension of Emergency Temporary Authority in the above-captioned matter.

If you have any questions, please feel free to contact me.

Sincerely,



Karen O. Moury

KOM/tlg
Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Rasier-PA LLC, a Wholly :
Owned Subsidiary of Uber Technologies, Inc., :
For Emergency Temporary Authority to Operate : Docket No. A-2014-2429993
An Experimental Ride-Sharing Network Service :
Between Points in Allegheny County, PA :

PETITION FOR EXTENSION OF EMERGENCY TEMPORARY AUTHORITY

Rasier-PA LLC (“Rasier-PA”), by and through its counsel, Karen O. Moury and Buchanan Ingersoll & Rooney PC, files this Petition for Extension of Emergency Temporary Authority pursuant to the Commission’s regulations at 52 Pa. Code § 5.41 so that it may continue operating an experimental ride-sharing network service between points in Allegheny County, Pennsylvania, and in connection therewith avers as follows:

I. Introduction

1. Under a grant of emergency temporary authority (“ETA”) effective August 21, 2014, Rasier-PA is providing ride-sharing network services that fill significant gaps in the transportation infrastructure in Allegheny County. It is meeting immediate and critical needs of the riding public such as those noted below that supported the grant of ETA to Rasier-PA:

Anthony McManus, Pittsburgh – 15233

I do not own a car, and because I have short windows sometimes to get to and from my job in Oakland and other neighborhoods, I have come to rely on Uber and use the service almost everyday. It’s impossible to do this with the other taxi services, as they are unreliable and certainly less affordable. I can say absolutely that not having this great service will affect my life in a very negative way.

Uber is one of the most reliable services I have used. The Yellow Cab experience has been horrible I have been up to two hours late to work having no way to get there. I would like to keep Uber available to people like me and others who need a reliable service to get around town and far places. I need Uber!

2. Consistent with the Commission's regulations which provide for the automatic extension of ETA when applications for temporary and permanent authority are simultaneously filed, the Commission should extend Rasier-PA's ETA so that it may continue fulfilling the needs of riders in Allegheny County for access to affordable, reliable and safe transportation alternatives, pending disposition of Rasier-PA's application for an experimental certificate of service.

II. Background

3. On April 14, 2014, Rasier-PA filed an application at Docket No. A-2014-2416127 for a certificate of public convenience evidencing approval to operate an experimental ride-sharing network service between points in Allegheny County ("Experimental Application"), pursuant to 52 Pa. Code § 29.352. Hearings have been held, briefs have been filed and a recommended decision is expected to be issued by September 25, 2014.

4. On July 2, 2014, Rasier-PA filed an application for ETA to operate an experimental ride-sharing network service between points in Allegheny County, Pennsylvania, pursuant to the Commission's regulations at 52 Pa. Code §3.383(c).

5. By Order adopted on July 24, 2014, the Commission approved the application of Rasier-PA for emergency temporary authority ("*ETA Order*") to operate an experimental ride-sharing network service between points in Allegheny County, Pennsylvania, pursuant to the Commission's regulations at 52 Pa. Code §3.383(c), subject to the filing of a Form E Certificate of Insurance and an acceptable tariff.

6. Upon Rasier-PA's compliance with the conditions of the *ETA Order*, the Commission issued a certificate of public convenience on August 21, 2014. Under the Commission's regulations, a grant of ETA is for an initial period not to exceed 60 days. 52 Pa. Code §3.383(c)(4)(i).

III. Discussion

7. In granting ETA, the Commission referred to supporting statements from riders and found that an immediate need exists in Allegheny County for Rasier-PA's experimental service due to the inadequacy of existing transportation services in Allegheny County. *ETA Order* at 13. The Commission further concluded that a substantial benefit will be derived from the initiation of a competitive service, observing that "the introduction of this new App-based transportation service in Allegheny County will provide consumers with another competitive alternative to traditional call and demand service that can provide a wider ranging, faster and more user-friendly scheduling of transportation services." *Id.*

8. The Commission's regulations provide that ETA may be automatically extended beyond the initial 60-day period pending disposition of the temporary authority ("TA") application, through the simultaneous filing of ETA, TA and permanent authority applications or by the filing of corresponding TA and permanent authority applications within 15 days of the filing of the ETA application. 52 Pa. Code §3.383(c)(4)(iv).

9. Since Rasier-PA's Experimental Application was filed prior to the grant of ETA, and will be ready for disposition in October 2014, no corresponding TA application has been filed. Due to the Commission's regulations providing that experimental service will be granted for a two-year period, no corresponding permanent authority application has been filed. The Experimental Application effectively replaces both the TA and permanent authority applications.

10. Given the procedural posture of Rasier-PA's Experimental Application, the grant of ETA following the filing of the Experimental Application, and the immediate need for the service in Allegheny County, Rasier-PA requests that the Commission extend the grant of ETA pursuant to the Commission's regulations at 52 Pa. Code § 3.383(c)(4)(iv), pending disposition of the Experimental Application.

11. Extension of the ETA pending disposition of the Experimental Application will permit Rasier-PA to seamlessly continue operating an experimental ride-sharing network service between points in Allegheny County, which is responsive to an immediate and critical need identified in Rasier-PA's ETA application and recognized by the Commission in granting ETA.

IV. Conclusion

WHEREFORE, on the basis of the foregoing, Rasier-PA LLC requests that the Commission extend the grant of emergency temporary authority pending adjudication of the application for a certificate of public convenience evidencing approval to operate an experimental ride-sharing network service between points in Allegheny County, Pennsylvania.

Respectfully submitted,



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Dated September 23, 2014