

Buchanan Ingersoll & Rooney PC

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January 21, 2015

VIA E-FILING

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

Re: Bureau of Investigation and Enforcement v. Uber Technologies, Inc.
Docket No. C-2014-2422723

Dear Secretary Chiavetta:

On behalf of Uber Technologies, Inc., I have enclosed for electronic filing the Objection of Uber Technologies, Inc. to Application for Subpoena, in the above-captioned matter.

Copies have been served on all parties as indicated in the attached certificate of service.

Sincerely,



Karen O. Moury

KOM/bb
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, BUREAU OF	:	
INVESTIGATION AND ENFORCEMENT	:	
	:	Docket No. C-2014-2422723
v.	:	
	:	
UBER TECHNOLOGIES, INC.	:	

**OBJECTION OF UBER TECHNOLOGIES, INC.
TO APPLICATION FOR SUBPOENA**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Section 5.421(f) of the Commission’s regulations, 52 Pa. Code § 5.421(f), Uber Technologies, Inc. (“UTI”), by and through its counsel, Karen O. Moury and Buchanan Ingersoll & Rooney PC, files this Objection to the Application for Subpoena filed by the Commission’s Bureau of Investigation and Enforcement (“I&E”) on January 9, 2015, and in support thereof, avers as follows:

1. UTI objects to the Application for Subpoena on the basis that a different UTI representative is the appropriate recipient of the requested subpoena.

2. The Application for Subpoena requests the issuance of a subpoena to Travis Kalanick, Chief Executive Officer of UTI.

3. UTI has advised I&E that the appropriate recipient of the requested subpoena is Jonathan J. Feldman, General Manager-Uber Pennsylvania. His office is located at 109 South 13th Street, Philadelphia, PA 19107.

4. Mr. Feldman is the UTI representative named in the Compliance Plans filed by Rasier-PA LLC, a wholly owned subsidiary of UTI, on December 24, 2014 as the person who is responsible for all matters of regulatory compliance in connection with the Commission’s

conditional approval of experimental authority to provide transportation network company services at Docket Nos. A-2014-2416127 and A-2014-2424608.

5. Additionally, as UTI's most senior executive management employee assigned to manage and supervise Pennsylvania operations, Mr. Feldman has access to the information that is sought by the Application for Subpoena, including trip data; identification of entities operating in Pennsylvania; the business relationships between UTI and these entities; and the date on which the UTI mobile application became available for passengers to access ridesharing services in Pennsylvania.

WHEREFORE, for the foregoing reasons, Uber Technologies, Inc. respectfully objects to the Application for Subpoena filed by the Bureau of Investigation and Enforcement on January 9, 2015 and requests that it be denied.

Respectfully submitted,

Dated: January 21, 2015



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Attorneys for Uber Technologies, Inc.

**BEFORE THE
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PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, BUREAU OF	:	
INVESTIGATION AND ENFORCEMENT	:	
	:	Docket No. C-2014-2422723
v.	:	
	:	
UBER TECHNOLOGIES, INC.	:	

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 Email and First Class Mail

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Dated this 21st day of January, 2015.



Karen O. Moury, Esq.