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August 8, 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 a Certificate of Public Convenience Evidencing Approval to Operate an Experimental Ride-Sharing Network Service Between Points in the Commonwealth of Pennsylvania, Excluding Designated Counties  
Docket No. A-2014-2424608

Dear Secretary Chiavetta:

On behalf of Rasier-PA LLC., I have enclosed for electronic filing the Response to the Motion for Continuance filed by Keystone Cab Service, Inc., E-Z Taxi, Good Cab, LLC and United Cab, LLC 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/tlg  
Enclosure  
cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Raiser-PA LLC, a Wholly Owned :  
Subsidiary of Uber Technologies, Inc. for a :  
Certificate of Public Convenience Evidencing : Docket No. A-2014-2424608  
Approval to Operate an Experimental :  
Ride-Sharing Network Service Between Points in :  
the Commonwealth of Pennsylvania, Excluding :  
Designated Counties :

**RESPONSE TO MOTION FOR CONTINUANCE  
OF KEYSTONE CAB, SERVICE, INC.,  
E-Z TAXI, GOOD CAB, LLC AND UNITED CAB, LLC**

TO THE HONORABLE MARY D. LONG AND JEFFREY A. WATSON:

Raiser-PA LLC (“Raiser-PA”), by and through its counsel, Karen O. Moury and Buchanan Ingersoll & Rooney PC, files this response, pursuant to 52 Pa. Code § 5.103, in opposition to the Motion for Continuance filed on August 4, 2014 by Keystone Cab Service, Inc., E-Z Taxi, Good Cab, LLC and United Cab, LLC (“Protestants”), and in support thereof, avers as follows.

At the prehearing conference held on July 24, 2014, it was determined that hearings in the above-captioned matter would be held in Pittsburgh, Pennsylvania on August 18-19, 2014. Following the prehearing conference, the Administrative Law Judges (“ALJs”) issued a Prehearing Order Setting Litigation Schedule on July 28, 2014 establishing the litigation schedule to reflect those hearing dates and requiring the filing of briefs on August 29, 2014. The hearing and briefing dates were selected to accommodate the ALJs’ request to the parties circulated by electronic mail on July 14, 2014 and to address specific scheduling conflicts raised by counsel at the prehearing conference.

The application was filed on June 2, 2014 and published in the *Pennsylvania Bulletin* on June 14, 2014. A period of over sixty days from notice of the application until the onset of

hearings provided the Protestants ample time to serve discovery and prepare for litigation. Moreover, the Protestants already raised concerns about the litigation schedule at the prehearing conference, which were dismissed by the ALJs.

As to the *En Banc* Transportation Hearing scheduled for August 28, 2104, notice of this hearing was issued by the Commission on July 18, 2014, nearly a week before the prehearing conference,<sup>1</sup> and any desire to hold the hearings in this case after that hearing could have been raised at that time. In any event, there is no need for the litigation schedule for this case to be affected by the Commission's *En Banc* Transportation Hearing. While rules for "transportation network companies" are among the topics listed for the agenda for that hearing, the notice clearly provides that the Commission is reviewing all transportation regulations, including the adequacy of driver integrity regulations, vehicle safety regulations and insurance requirements, as well as the possible elimination of the need standard and other issues. The Commission was aware of the pending applications of "transportation network companies" and did not suggest that they be stayed or delayed pending the conclusion of that hearing. Any recommendations made at that hearing regarding rules for "transportation network companies" that result in new regulations would be applied to these entities going forward if the applications are approved.

Regarding the scheduling conflict of the Protestants' witness, Mr. Joshua Freedman, Rasier-PA is willing to accommodate that conflict by agreeing to rescheduling the hearings to later in the same week, or on August 21-22, 2014, if those dates are acceptable to the ALJs. Based on Rasier-PA's discussions with other counsel in this proceeding, it is believed that the parties are available on these dates.

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<sup>1</sup> Secretarial Letter dated July 18, 2014 at Docket No. M-2014-2431451.

WHEREFORE, Rasier-PA LLC respectfully requests that the Commission deny the Protestants' Motion for Continuance, or in the alternative, reschedule the hearings to August 21-22, 2014.

Respectfully submitted,

August 8, 2014



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*Attorneys for Rasier-PA LLC*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Rasier-PA LLC, a Wholly Owned       :  
Subsidiary of Uber Technologies, Inc. for a       :  
Certificate of Public Convenience Evidencing       :  
Approval to Operate an Experimental               :  
Ride-Sharing Network Service Between Points in   :  
the Commonwealth of Pennsylvania, Excluding       :  
Designated Counties                                    :

Docket No. A-2014-2424608

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 E-Mail and/or First-Class Mail**

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Dated this 8<sup>th</sup> day of August, 2014.



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Karen O. Moury, Esq.