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August 21, 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 Reply of Rasier-PA LLC to New Matter 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 Rasier-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

**REPLY TO NEW MATTER  
OF KEYSTONE CAB, SERVICE, INC.,  
E-Z TAXI, GOOD CAB, LLC AND UNITED CAB, LLC**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Raiser-PA LLC (“Rasier-PA”), by and through its counsel, Karen O. Moury and Buchanan Ingersoll & Rooney PC, pursuant to 52 Pa. Code § 5.63, files this Reply to New Matter which was filed by Keystone Cab Service, Inc., E-Z Taxi, Good Cab, LLC and United Cab, LLC (“Protestants”) in connection with a Response to Preliminary Objections.

1. Denied. It is specifically denied that on July 1, 2012, the Commission directed Rasier-PA to cease and desist from brokering transportation. To the contrary, it is averred that an advisory bureau of the Commission sent a letter to Uber Technologies, Inc. dated July 6, 2012 and that the contents of the letter speak for themselves.

2. Admitted.

3. Denied. It is specifically denied that Applicant has been operating a taxi service without Commission authority.

4. Denied in part and admitted in part. It is specifically denied that such individuals are “Uber drivers.”

5. Admitted.

6. Admitted.

7. Denied. It is specifically denied that Rasier-PA has “repeatedly ignored the Public Utility Commission.” To the contrary, it is averred that Rasier-PA has filed the applications that are currently pending before the Commission in response to the concerns that have been raised about the need for ridesharing network services to be authorized by the Commission.

8. Denied. It is specifically denied that Rasier-PA has filed the incorrect application with the Commission. To the contrary, it is averred that Rasier-PA filed an experimental service application as suggested by Commission staff. It is further averred that the Commission has already approved an experimental service application for similar services. *See Application of Yellow Cab Company of Pittsburgh, Inc., t/a Yellow X*, Docket No. A-2014-2410269 (Order adopted May 22, 2104).


9. Denied. It is specifically denied that Rasier-PA should have filed an application for a certificate of public convenience as a common carrier on call or demand. To the contrary, it is averred that that Rasier-PA filed an experimental service application as suggested by Commission staff. *See Yellow Cab, supra*.

10. Denied. It is specifically denied that Rasier-PA has used “the guise of experimental service” as a means of circumventing the Commission’s authority. To the contrary, it is averred that Section 29.352 of the Commission’s regulations, 52 Pa. Code § 29.352, expressly recognizes experimental service as a separate scheme of classification. It is further averred that the filing of an experimental service application demonstrates that Rasier-PA is requesting authority from the Commission to operate a ridesharing network service, which is directly the opposite of seeking to circumvent the Commission’s authority.

WHEREFORE, Rasier-PA respectfully requests that the Commission approve its application for experimental service on the basis of the evidentiary record and applicable law.

Respectfully submitted,

August 21, 2014

  
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*Attorneys for Rasier-PA LLC*


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the Commonwealth of Pennsylvania, Excluding     :  
Designated Counties

**VERIFICATION**

I hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect Rasier-PA LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

8/21/14  
Date

  
Karen O. Moury, Esq.

**BEFORE THE  
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Designated Counties :

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 21<sup>th</sup> day of August, 2014.



Karen O. Moury, Esq.