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September 24, 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 the Counties of Lehigh and Northampton, Pennsylvania
Docket No. A-2014-

Dear Secretary Chiavetta:

On behalf of Rasier-PA LLC, a wholly owned subsidiary of Uber Technologies, Inc., I have enclosed for electronic filing an Application for Emergency Temporary Authority to Operate an Experimental Ride-Sharing Network Service in the above-captioned matter. The filing fee of \$100.00 has been remitted through the eFiling system.

Please note that due to the time it takes to recruit and sign up drivers, Rasier-PA plans to begin this process upon the filing of this application. However, Rasier-PA has no intention to launch service in the Counties of Lehigh and Northampton, Pennsylvania without authority from the Commission.

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-
An Experimental Ride-Sharing Network Service :
Between Points in the Counties of Lehigh and :
Northampton, Pennsylvania :

APPLICATION FOR EMERGENCY TEMPORARY AUTHORITY

Rasier-PA LLC (“Rasier-PA”), by and through its counsel, Karen O. Moury and Buchanan Ingersoll & Rooney PC, files this Application for Emergency Temporary Authority (“ETA Application”) to operate an experimental ride-sharing network service between points in the Counties of Lehigh and Northampton, Pennsylvania, pursuant to the Commission’s regulations at 52 Pa. Code §3.383(c), and in connection therewith avers as follows:

I. Introduction

1. It is beyond dispute that ridesharing network services would fill significant gaps in the transportation infrastructure in Lehigh County and Northampton County, Pennsylvania (“Lehigh Valley”). In short, as rider after rider will attest, Lehigh County and Northampton County need Rasier-PA’s proposed service. Below are a just a handful of examples of riders touting the proposed service for the Lehigh Valley.

Adam Feltes – Northampton County - 18104

The Lehigh Valley has next to no public transportation. I live 4 miles from an airport and still wait over an hour if I call a cab. Last week, I flew home from a business trip and met up with some friends at Bethlehem’s music fest. I decided to have a few drinks. I called for a taxi at 12:30 and sat down on a park bench with my luggage until 2 AM. I took a cab 9 miles home. It cost me \$28. That’s right...\$28. The driver did not even help me with my luggage. He had the nerve to ask me what his tip would be before he ran my card. This is a monopolistic mess. I

very often do not go out and feed our local economy because of these logistics. I want to be responsible and safe. I want to have access to affordable and accessible transportation without calling my neighbor's friend's grandmother. I've been to San Fran and Chicago this week. Easy. Open UBER. You're where you need to be.

Steve Schmitt – Northampton County – 18015

The transportation options for those of us in the Lehigh Valley who do not drive are woefully inadequate. We can't get to necessary medical appointments, critical job opportunities, family responsibilities or many essential trips after dark. Please let us enjoy the mobility afforded many others in our state and throughout the country by 21st technology such as that employed by Uber to improve transportation efficiency.

Kathleen Parker – Northampton County - 18042

Pretty soon I won't be able to drive any more and I want safe, reliable, affordable transportation. Taxis in Easton are notoriously unreliable. I almost missed an international flight last year depending on one. Please allow Uber everywhere in the state. I have used Uber X in other cities and it's great.

Benjamin Herbsman – Lehigh County - 18104

I am a student at Muhlenberg College in Allentown, PA. We need better safe and reliable transportation options in my area of PA (Lehigh Valley). There are many colleges/universities in this area that would benefit tremendously from services like Uber. It can be difficult for students to go out and travel safely because there are few public transportation or (reliable) taxi services, and most nightlife is far from campus or in neighboring Bethlehem. Services like Uber would help these students and PA residents travel safely while supporting local businesses.

Helen Manzella – Lehigh County – 18104

I live in Allentown, PA, and have personally needed a safe, flexible transportation option that public transport was not able to provide multiple times in the past.

However, looking to our city's exciting future with major renewal and construction happening downtown, I can only imagine how successful Uber would be around here. It would be awesome!

Come on, PUC, get with the future :-)

2. Exhibit A contains twenty supporting statements, including three of the statements shown above, which offer compelling reasons to grant ETA to Rasier-PA by demonstrating the immediate need for access to safe and reliable transportation alternative in Northampton County for students, residents and visitors.

3. Exhibit B contains seventeen supporting statements, including three of the statements shown above, which offer compelling reasons to grant ETA to Rasier-PA by demonstrating the immediate need for access to safe and reliable transportation alternative in Lehigh County for students, residents and visitors.

4. Rasier-PA is filing this ETA Application to urge the Commission to grant authority for it to operate an experimental ride-sharing network service between points in the Counties of Lehigh and Northampton. This ETA application is necessary due to the immediate need of the riding public in the Lehigh Valley to be able to use an innovative game-changing technology that permits residents and visitors to access safe, economic and reliable transportation. Rasier-PA's existing application to provide service throughout Pennsylvania is mired in an outdated and antiquated regulatory framework that allows existing businesses to keep new competitive services out of the market. With approval of this ETA Application, the riding public in the Lehigh Valley will have access to affordable, reliable and safe transportation alternatives and be able to realize the benefits of ridesharing in a way that promotes customer choice, competition and economic growth.

II. Background

5. On June 2, 2014, Rasier-PA filed an Application at Docket No. A-2014-2424608 requesting the issuance of 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 (“Application”), pursuant to 52 Pa. Code § 29.352. Rasier-PA is a limited liability company with the Pennsylvania Department of State at Corporation Bureau Entity Identification Number 4262217.

6. Notice of Rasier-PA’s Application was published in the *Pennsylvania Bulletin* on June 14, 2014, with protests due by June 30, 2014. Protests were filed by taxicab and limousine companies. The taxicab companies are not authorized to provide service in Lehigh County or Northampton County. The limousine companies have statewide authority but are based in suburbs of Philadelphia County and are not believed to be serving customers in Lehigh County or Northampton County.

7. Travis Kalanick is the Manager of Rasier-PA and the only member of the limited liability company.

8. Rasier-PA does not intend to utilize a trade name.

9. Rasier-PA’s physical address is:

122 Meyran Avenue
Pittsburgh, PA 15213

10. Rasier-PA’s mailing address is:

182 Howard Street, #8
San Francisco, CA 94105

11. Rasier-PA’s attorney is:

Karen O. Moury (PA ID No. 36879)
Buchanan Ingersoll & Rooney PC
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
Phone: 717-237-4820
Fax: 717-233-0852
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12. Rasier-PA holds emergency temporary authority approved by Commission Order adopted on July 24, 2014 and Secretarial Letter dated August 21, 2014 to operate an experimental ride-sharing network service between points in Allegheny County, Pennsylvania at Docket No. A-2014-2429993. A certificate of public convenience was issued on the same date at A-6416478.

III. Legal Standards Applicable to ETA Application

13. Section 1103(d) of the Public Utility Code (“Code”), 66 Pa.C.S. § 1103(d) provides that the Commission may without hearing grant temporary certificates of public convenience in emergencies, pending action on permanent certificates.

14. Under regulations promulgated by the Commission pursuant to Code Section 1103(d), “a grant of ETA “shall be made upon the establishment of an immediate need for the transportation of passengers.” 52 Pa. Code § 3.384(b)(1). That provision further states that requests involving counties warrant approval when supported by evidence that there is a need for service to or from points in that county and that there is a reasonable certainty that the service will be used.

15. The Commission’s regulations further provide that a grant of ETA will be made when it is established that there is or soon will be an immediate transportation need. Specifically, the regulations provide that a showing of immediate need may involve “the failure of existing carriers to provide service or comparable situations which require new carrier service before an application for permanent authority can be filed and processed.” 52 Pa. Code § 3.384(b)(2). The regulations further state that an “immediate need will not normally be found to exist when there are other carriers capable of rendering the service unless it is determined that there is a substantial benefit to be derived from the initiation of a competitive service.” *Id.*

16. In addition, the Commission's regulations require an ETA application to contain specific information, including an explanation of the nature of the service and how it will be provided. 52 Pa. Code § 3.383(c)(3).

IV. Discussion of Immediate Need

17. No carriers currently hold a certificate of public convenience to provide experimental ride-sharing network service in Lehigh County or Northampton County.

18. In granting ETA to Rasier-PA for Allegheny County, the Commission recognized that use of an App-based technology to arrange passenger transportation services allows for a wider ranging, faster and more user-friendly scheduling of transportation.

19. In addition, Rasier-PA's proposed services are responsive to consumers who wish to have a choice about the way they are transported. For instance, the availability of the proposed services would allow riders to request transportation through the Internet or App rather than by a street-hail, which is an option that many riders find to be convenient and preferable to taxicab service.

20. Rasier-PA affiliates receive multiple requests on a daily basis requesting the proposed service, and Rasier-PA has no doubt that consumers will use the service if Rasier-PA's ETA application is approved. Passengers who would use the services proposed by Rasier-PA have submitted supporting statements, which are attached as Exhibit A and Exhibit B and demonstrate immediate need for the proposed service.

V. Description of Service

21. Rasier-PA plans to use a digital platform to connect passengers to independent ride-sharing operators ("Operators") with whom it will contract. Operators will use their personal, noncommercially licensed vehicles for the purpose of providing transportation services.

Rasier-PA plans to license the UTI technology to generate leads from riders who need transportation services. Rasier-PA will not own vehicles, employ drivers or transport passengers.

22. Under this proposal, riders will request transportation via UTI technology through the Internet or a mobile application (“App) on their smartphones. When an Operator responds to the request, the rider will receive the vehicle type and a photo of the Operator, along an indication of the Operator’s current location and estimated time of arrival. Operators will not be permitted to solicit or accept street-hails.

23. Rasier-PA proposes disclose the fare calculation method, the applicable rates being charged and the option for an estimated fare to the passenger before booking the ride. Upon completion of a trip, an electronic receipt will be transmitted to the passenger’s email address or App documenting the details of the trip. The receipt will contain information for filing a complaint with the Commission.

VI. Insurance

24. Rasier-PA will require Operators to provide proof of valid and current liability insurance on all vehicles used in offering ride-sharing services in at least the amounts specified in 75 Pa.C.S. §§ 1702 and 1711. This policy will cover Operators when they are not available through the App and are using their vehicles for personal reasons.

25. Rasier-PA will submit to the Commission proof of adequate insurance evidencing policies and coverage that comply with and exceed the minimum standards required by the Commission at 52 Pa. Code §§ 32.11 and 41.21, as follows¹:

¹ Rasier-PA is aware of the provision in the ETA regulations at 52 Pa. Code § 3.83(c)(3)(G) requiring the submission of evidence of insurance with the ETA application, and specifically requests a waiver of that provision,

- a. **\$1 million of liability coverage per incident.** Rasier-PA will maintain liability insurance in the amount of \$1 million to cover liability for bodily injury, death or property damage, which far exceeds the Commission's minimum requirement of \$35,000. This coverage will cover the Operator's liability from the time the Operator accepts a trip request through the App until the completion of a trip. It will include first party medical benefits in the amount of \$25,000 and first party wage loss benefits in the amount of \$10,000 for passengers and pedestrians.
- b. **\$50,000/\$100,000/\$25,000 of liability coverage between trips.** During the time that an Operator is available but between trips, Rasier-PA will maintain liability insurance which exceeds the amounts required by the Commission's regulations.
- c. **\$1 million of uninsured/underinsured motorist coverage per incident.** Rasier-PA will maintain uninsured/underinsured motorist coverage of \$1 million per incident, which will apply if another motorist causes an accident with an Operator's vehicle and does not carry adequate insurance. This is important to ensure that passengers are protected in a hit and run situation.

VII. Driver Integrity

26. Rasier-PA will require Operators to meet standards that are consistent with and significantly more stringent than the Commission's requirements set forth in 52 Pa. Code §§ 29.502-29.507, as described more fully below:

- a. *Criminal Background Checks.* Rasier-PA will conduct a local and national criminal background check that includes the Multi-State/Juris Criminal Records Locator and the National Sex Offender Registry database on each Operator before the Operator may access the digital platform to receive requests for transportation. A match on the national sex offender registry or a conviction that appears on a criminal background check within the past 7 years for crimes of violence, sexual abuse, felony, robbery, or felony fraud, shall automatically and permanently disqualify an individual from acting as an Operator.

with the expectation that if the Commission grants the ETA application, it will do so conditionally subject to the submission of evidence of insurance acceptable to the Commission.

b. *Driving History Record.* Rasier-PA will have a driving history record conducted on each Operator before the Operator may offer service. A conviction that appears on a driving history check within the past 7 years for aggravated reckless driving, driving under the influence of drugs or alcohol, hit and run, attempting to evade the police, or the use of a motor vehicle to commit a crime, or a conviction that appears on a driving history check in the previous 3 years for driving with a suspended or revoked license, shall automatically disqualify an individual from acting as an Operator.

c. *Drugs or Alcohol.* Rasier-PA will have a zero tolerance policy on the use of drugs or alcohol while and Operator is providing ride-sharing services. Notice of this zero tolerance policy is on both the Rasier-PA and UTI websites, along with procedures to report a complaint, including a telephone number for the Commission about an Operator with whom the passenger was matched and for whom the passenger reasonably suspects was under the influence of drugs or alcohol during the course of the ride. Rasier-PA will immediately suspend an Operator upon receipt of a passenger complaint alleging a violation of the zero tolerance policy, and such suspension will last the duration of Rasier-PA's investigation.

d. *Other Driver Requirements.* Operators will be required to possess a current, valid driver's license, proof of registration, proof of motor vehicle insurance and be at least 21 years of age.

VIII. Vehicle Safety

27. Rasier-PA will require Operators' vehicles to meet standards that are consistent with the Commission's requirements, particularly as to safety, as more fully described below:

a. *Inspections.* Rasier-PA will require vehicles operated by Operators to undergo and pass an annual and comprehensive safety inspection before the vehicle provides a

ride-sharing service, which is consistent with the Commission's requirements at 52 Pa. Code §§ 29.402 and 29.405. Such inspections must be performed by an official inspection station and comply with Pennsylvania vehicle laws and regulations at 75 Pa. C.S. Chapter 47 and 67 Pa. Code §§ 175.61-175.80, including but not limited to suspension and steering components; braking systems; tires and wheels; lighting and electrical systems; and horns and warning devices. Additionally, Rasier-PA acknowledges that vehicles are subject to inspection by Commission enforcement officers through routine inspections to ensure compliance with these requirements.

b. *Vehicle Age and Type.* Operators contracted by Rasier-PA will be required to use motor vehicles that are not more than 8 years old and are designed to transport no more than 10 persons, including the driver. Eligible vehicles include street-legal coupes, sedans, or light duty vehicles including vans, minivans, sport utility vehicles, hatchbacks, convertibles and pickup trucks.

c. *Other Vehicle Requirements.* Vehicles will be required to be in a condition that meets or exceeds the standards set forth in 52 Pa. Code § 29.403, including seats in working order; vehicles in clean and sanitary condition; factory type heaters in working order; clean trunk compartments suitable for carrying luggage; exteriors free of large dents or gouges; four matching wheel covers; and operative air conditioning. Vehicles will also use markings, such as trade dress or a placard, to identify them.

IX. Other Requirements

28. Rasier-PA submits a Statement of Financial Position as Exhibit C.

29. Rasier-PA will maintain a website that provides a customer service telephone number or email address.

30. Rasier-PA will maintain records to demonstrate compliance with all of the requirements, standards and obligations described in this ETA Application.

31. Rasier-PA understands that it is subject to an annual assessment based upon reported gross Pennsylvania intrastate revenues, which will be handled through delegation to a third party to interface with the Commission.

32. Rasier-PA further understands that it has sole responsibility to address Commission-related passenger complaints and that a failure to adhere to the commitments made in this ETA Application may result in the Commission imposing sanctions, including civil penalties, suspension and revocation of the certificate of public convenience.

33. Rasier-PA is not currently engaged in unauthorized intrastate transportation for compensation between points in the Counties of Lehigh and Northampton, Pennsylvania and will not engage in such transportation unless and until such authorization is received from the Commission.

34. While Rasier-PA has sought to comply with the key provisions of the regulations governing the filing and disposition of ETA Applications at 52 Pa. Code §§ 3.383-3.384, it is requested that the Commission exercise its discretion to grant waivers of any specific provisions that may not be fully satisfied due to their inapplicability to an ETA Application that is filed within the context of an Application for approval to offer experimental ridesharing network services. *See Township of Collier v. Pennsylvania American Water Company*, Docket No. C-20016207, 2004 Pa. PUC LEXIS 26 (2004) (Commonwealth agency may waive its own regulations).

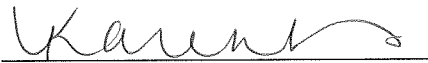
35. Granting the ETA Application, conditioned upon submitting acceptable evidence of insurance, will allow Rasier-PA to offer passengers in the Lehigh Valley area an innovative

and unique service for which they are clamoring under the oversight of the Commission that is designed to ensure driver integrity, vehicle safety and adequate liability insurance.

X. Conclusion

Rasier-PA LLC requests that the Commission approve the Application for Emergency Temporary Authority to operate an experimental ridesharing network service between points in the Counties of Northampton and Lehigh, Pennsylvania.

Respectfully submitted,



Karen O. Moury
Buchanan Ingersoll & Rooney PC
409 North Second Street
Suite 500
Harrisburg, PA 17101
(717) 237-4820

Dated September 24, 2014

Attorneys for Rasier-PA LLC

EXHIBIT A

The Lehigh Valley would benefit from Uber in many ways. As dean of students at Lafayette College, I know that my students would use Uber for transportation to and from bus stations in Easton, to and from the ABE airport in Allentown, and to places like Musikfest or other attractions within the Lehigh Valley.

Students today - in fact, even older deans like me - use Uber in other cities and expect that our own has cutting edge transportations like Uber in our own backyard. Just now, I am writing this on vacation in Boston where I used Uber earlier today to go from one friend's place to another.

Uber is not only convenient, safe, and competitively priced, but it is a sign of a city that is modern. The Lehigh Valley will benefit economically by offering services like Uber that signify contemporary living. It will also benefit because students like my own will more likely travel and spend money and time at attractions, shopping, etc. if it is easy to get around and affordable.

Bring Uber to the Lehigh Valley and to Easton, PA specifically!

PAUL J. MCLOUGHLIN II
PMCLOUGH@YAHOO.COM
Zip Code 18042

Signature: *Paul J. McLaughlin II*

Email: pmclough@yahoo.com

I live in Forks Township which is part of the Lehigh Valley.
It has happened to me numerous times that I have to wait more than an hour if I order a taxi from the Easton based taxi services.
They never show up on time and if I call to remind them they treat me like if they are doing me a favor.
The prices are ridiculously high and I pay \$19 to \$28 dollars for a ten minute ride to say the bus station in Easton from my home.
If I have to go to the Lehigh Valley Airport early in the morning or if I come back late at night at the same airport, sometimes I
have to pay \$50 and that only if they feel like serving me.
When I go to big cities like Philadelphia as I was there last week, I have no problem getting an Uber car at a reasonable rate.
I hope Uber service becomes available in my area so I can have the same level of affordable and good service in Lehigh Valley as
well.

Jay Malik
abc@jaymalik.com
Zip Code 18040

Signature: *Jay Malik*

Email: abc@jaymalik.com

Please bring Uber to the lehigh valley area. I grew up in this area and my family still resides there. I live in Jersey City currently and use Uber at least 1 a week.

There is a significant problem for reliable and affordable cab/bus services in the Lehigh Valley which leads to a high number of DUI arrests and related accidents. I personally have a family member affected by this - he is permanently brain damaged and as a result of a drunk driving incident. There simply is no other option available to get home from the bars other than a designated driver which the majority of the population in the area seems incapable of doing. Calling a cab will result in approx an hour wait if they even show up at all.

Another reason I believe this area would benefit is for the elderly community. I have been looking to set up an Uber account for my grandmother who has numerous doctors appts but found Uber has not been made available in the area. She is no longer able to drive and has to rely on family members to take her to her appts, grocery stores, etc. This puts a strain on them as a and takes away my grandmother's independence. An uber account and services will enable her to gain some of her independence back and also to take the strain off of the other family members.

Nicole Stover
vargasnicole@gmail.com
Zip Code 18020

Signature: 

Email: vargasnicole@gmail.com

My girlfriend and I wanted to move out of the city because we felt unsafe. Now living in the Lehigh Valley area, she often has to walk home alone at night from work because I am still working, we share a car, and there isn't reliable public transportation. When we first moved here, I said, "Don't worry, I'm sure you can just take Uber," as that's what we did while living in Philadelphia. Sadly, we discovered Uber wasn't active in this area and there are never cabs in the vicinity.

In an area with so many universities, Uber would have a great impact on reducing the number of drunk drivers. Most of the nightlife here isn't within walking distance and people drive to the bars.

We need Uber here because we need options. We need a safe, reliable company to be there for us when we don't have a way to get somewhere. Recently, my car broke down, and since my girlfriend doesn't drive (and we're new in town), I didn't have a way of getting home. My sister drove into town from an hour and a half away to pick me up.

Now, when we looked into moving here, we of course looked into public transportation. There seemed to be a good bus system. However, it comes infrequently, stops early, and is completely unavailable some days. Thus, it is completely unreliable and my girlfriend must walk home late at night because there are no buses.

Carrie Reilly
reillycarrie@gmail.com
Zip Code 18015

Signature: *Carrie Reilly*

Email: reillycarrie@gmail.com

The Lehigh Valley has next to no public transportation. I live 4 miles from an airport and still wait over an hour if I call a cab. Last week, I flew home from a business trip and met up with some friends at Bethlehem's music fest. I decided to have a few drinks. I called for a taxi at 12:30 and sat down on a park bench with my luggage until 2AM. I took a cab 9 miles home. It cost me \$28. That's right... \$28. The driver did not even help me with my luggage. He had the nerve to ask me what his tip would be before he ran my card. This is a monopolistic mess. I very often do not go out and feed our local economy because of these logistics. I want to be responsible and safe. I want to have access to affordable and accessible transportation without calling my neighbor's friend's grandmother. I've been to San Fran and Chicago this week. Easy. Open UBER. You're where you need to be.

Adam Feltes
feltes@me.com
Zip Code 18014

Signature: *Adam Feltes*

Email: feltes@me.com

Public transportation is very poor in the Lehigh Valley. Buses don't come as frequently as we want and there's maybe like a 1 taxi company per city. On a Friday night, you can wait over an hour just for a cab. Having uber would make it convenient for weekend nights out with friends and decrease the amount of drunk driving in the lehigh valley. There are so many people I know who can't afford cars or anything and have such a struggle getting to work. Uber would be very convenient for them as well as random times where we are stranded.

Ann Hoang
Anndt.hoang@gmail.com
Zip Code 18045

Signature:



Email: anndt.hoang@gmail.com

The transportation options for those of us in the Lehigh Valley who do not drive are woefully inadequate. We can't get to necessary medical appointments, critical job opportunities, family responsibilities or many essential trips after dark. Please let us enjoy the mobility afforded many others in our state and throughout the country by 21st technology such as that employed by Uber to improve transportation efficiency.

Steve Schmitt
director@car-free.org
Zip Code 18015

Signature: *Steve Schmitt*

Email: director@car-free.org

I fully support UBER in PA and hopefully in the Lehigh Valley.

My first experience with UBER was in LA in May 2014. I felt safe and comfortable did not have to carry cash for the ride and totally loved the experience of the efficient friendly drivers. It was very very affordable and made a huge difference in my LA experience. I would use UBER in the greater LEhigh Valley area at night when driving more difficult for me and especially to further locations that parking might be an issue. I would use UBER for Musikfest for sure so that I did not have to park nor depend on the bus.

Recently I needed a ride home from a minor out patient procedure and I thought - how wonderful it would have been to just request a UBER when i was ready to go home vs asking someone to take off time from work.

I would use UBER to the airport. It would be a great help to have UBER when out of town visitors come and they can be more mobile without renting a car in a area they don't know and I don't have to drive them around. PLEASE give us UBER in PA!
thank you!

diane mckee
diane.g.mckee@gmail.com
Zip Code 18045

Signature: *Diane G McKee*

Email: diane.g.mckee@gmail.com

To the PUC,

I first encountered Uber in San Diego while on a temporary duty assignment for the military during the summer of 2014. Uber consistently served as a reasonably priced, convenient, safe, and professional transportation service which could not be said about some taxi encounters.

After my temporary assignment I traveled home to Bethlehem, Pennsylvania in the beginning of August for two weeks of leave. My second day home I found myself in rather desperate need of an Uber. I attended Musikfest with a friend and after we encountered some differences in interests and healthy choices I decided it was time for me to get out of there. I actually opened the Uber application on my phone before kicking myself for forgetting I was not in San Diego anymore. But, amidst my internal embarrassment I had an epiphany and realized who was actually making the mistake. It makes more sense to have Uber service in the greater Lehigh Valley than it does to not; especially during Musikfest. It is no secret that there is no dependable, nor "hailable", cab service in the Valley that can be called upon to respond to the transportation needs associated with a festival that has recently become so focused on the consumption of alcohol. Uber could provide an additional, and convenient, option to those who had a little to much to drink to drive home. Parking is another major issue Musikfest attendees experience. I did not attend Musikfest subsequent to the first night for the sheer reason that I did not want to deal with parking. Uber could alleviate the parking issue in the downtown Bethlehem area and possibly increase Musikfest attendance.

Musikfest is not the only aspect of the Valley that requires Uber service. Uber could be a valuable service in Allentown where a Hockey arena is being built in an area that does not even remotely have enough parking to support such a venue. Uber could provide transportation to the Sands Casino and Outlet stores in Bethlehem, or to Coca-Cola Park in Allentown. Uber could provide safe and affordable transportation for college students of the Valley's many colleges and universities. In a metropolitan area that lacks a train or subway system and dependable taxi service yet insists on continuing to build modern event venues and hold festivals that attract millions of people Uber, and like services, are certainly a necessity.

Victor Broskey
jrranger114@hotmail.com
Zip Code 18018

Signature: 

Email: jrranger114@hotmail.com

Well I live in the Lehigh Valley and currently do not drive. In order for me to arrange for a taxi I must call a service be wait listed and then called back for an instant ride depending on their availability this process can take up to 40 to 50 minutes. Not only must I call there is no Internet options readily available. During holidays it is nearly impossible to call a cab company and get a instant ride you must order taxis days on advance. Carshare would be a great service in my area and greatly appreciated by many people in the valley.

timothy huertas
tdhuertas@gmail.com
Zip Code 18017

Signature: *timothy D. Huertas*

Email: tdhuertas@gmail.com

We can never get a taxi in Bethlehem. The customer service is horrible. There have been many times that have claimed they were coming at 2 am when we didn't want to drive home from the bar and they wouldn't show up causing us to have to walk over two miles home. Using uber and their technology in other city's I know they would not have this problem.

Ryan Felice
fecer1@aol.com
Zip Code 18018

Signature: *Ryan Felice*

Email: fecer1@aol.com

I have been utilizing Uber in large cities for years and found the service a major upgrade to taxi service. I never need to worry that I have wandered off the beaten track and won't be able to hail a cab. The drivers are infinitely more pleasant and easy to talk to, the vehicles cleaner and I never need to stand in the rain waiting for a car. I wait inside until Uber notifies me the driver has arrived. Ever Uber driven with whom I have spoken is much happier in the Uber system than they were driving a cab or a limo. This service would be a great addition to the rest of the state.

Stephen Bajan
steve.bajan@gmail.com
Zip Code 18064

Signature: *Stephen Bajan*

Email: steve.bajan@gmail.com

I work for an airport advertising company in Allentown, PA (Lehigh Valley). We have employees within our company who travel extensively, and use many rental cars just for rides to and from the airport. We also accommodate many out of town employees since this is our corporate office. Uber at our fingertips would be a great resource for many from our company and associates. I would use Uber on a personal level as well. Please consider Uber in the Lehigh Valley!

Susan Becker
susnsage@gmail.com
Zip Code 18088

Signature: *Susan Becker*

Email: susnsage@gmail.com

I'm a property owner in Pennsylvania, residing in Seattle. I'm appalled that the PUC would even consider NOT allowing Uber or other car sharing services to provide needed transportation services in Pennsylvania. I frequently use Uber here in Seattle (we had our own little battle with City Hall). It's a great service and really helps me get around when other options fail. My elderly parents still live in the Lehigh Valley and life would be so much better for them (and me) if they could use a service like Uber to help them get around. Taxis are insufficient, dirty, unreliable and ineffective. Give Uber a chance in Pennsylvania.

Vanessa Lund
vanessa@cofen.com
Zip Code 18015

Signature: *Vanessa Lund*

Email: vanessa@cofen.com

Pretty soon I won't be able to drive any more and I want safe, reliable, affordable transportation. Taxis in Easton are notoriously unreliable. I almost missed an international flight last year depending on one. Please allow Uber everywhere in the State. I have used UberX in other cities and it's great.


Kathleen Parker
kparker@hampton-east.com
Zip Code 18042

Signature: *Kathy Parker*

Email: kparker@hampton-east.com

People get mugged all the time trying to walk home because they can't catch the student bus at Lehigh University in Bethlehem PA. It is a VERY sketchy area and we really need uber!! It would boost our dying economy held together by Lehigh students.

Haley Miller
hpm215@lehigh.edu
Zip Code 18015

Signature: 

Email: hpm215@lehigh.edu

I've used Uber several times on other states (NY and FL) and I find it to be extremely helpful in the effort to avoid driving after my husband and I have been drinking. If PA had Uber (which is where I live) it would allow me to continue to make smarter, safer decisions when it comes time to drinking and driving. With Uber, there is no excuse that there wasn't another option. Bring Uber to PA!!! Please!!! Help us keep ourselves and others on the road SAFE and SOUND!

Lauren Russo
LaurenCRusso@gmail.com
Zip Code 18064

Signature: 

Email: laurencrusso@gmail.com

The Lehigh Valley has a terrible public transportation system and minimal, undependable, taxi services. At times it can take three buses and over an hour to go what would be a fifteen minute car ride and forget about if it's late at night. No buses run and a taxi can take upwards of two hours to get to you. I go to school in Philadelphia where public transportation and taxis are readily available and Uber is still my favorite choice in transportation please bring Uber to the Lehigh Valley and all of Pennsylvania.

Tony Alvarez
tonyalvarezbills@gmail.com
Zip Code 18018

Signature: *Tony Alvarez*

Email: tonyalvarezbills@gmail.com

I live in the Lehigh Valley and go to school in State College. On demand Transportation is shoddy at best in State College and is non existent in the Lehigh Valley. Most people my age have no way home from bars in the area and resort to drunk driving. Time and time again we see more DUI's in the Lehigh Valley and the only thing being done to prevent them is raising fines and adding more sever penalties. This is a reactive approach. Uber is a proactive one. There is no reason to prevent such a service from going into place.

Christopher Siedt
csiedt@gmail.com
Zip Code 18020

Signature: 

Email: csiedt@gmail.com

I live in the Lehigh Valley, specifically in Bethlehem. There are no reliable taxi services and there are no reliable public transportation services that run past 6 or 7 in the evening despite having a casino and many colleges and many big concerts. There are a lot of college students (within 20 minutes from my house the colleges are DeSales University, Lehigh University, Lafayette University, Moravian College, Muhlenberg College...and the list goes on) that party at the plentiful bars and I'm sure in their college housing and yet there is not way for them to get home unless they have a designated driver (which isn't often the case) or if they drive drunk. There is also a big casino that functions 24-7 with lots of people and lots of partying. There is ArtsQuest and the Musikfest Cafe which hosts big name concerts year-round. And yet there is no reliable, affordable way to get from one place to another! WE NEED UBER in the Lehigh Valley. It only makes sense!!

Ariel Bernath
abernath@live.com
Zip Code 18055

Signature: 

Email: abernath@live.com

EXHIBIT B

Dear Pennsylvania Public Utilities Commission:

I am writing in support of Uber's expansion to all parts of Pennsylvania, extending beyond their current footprints in the state's two largest cities, Pittsburgh and Philadelphia. Pennsylvania's smaller cities and towns-- places like where I am from, the Lehigh Valley, including Allentown, Bethlehem, Easton, and others-- are in dire need of transportation options that would allow residents and visitors to reduce their dependence on personal vehicles. Public transportation is non-existent in many of these places, and where public transportation does exist, its service area and hours of operation are limited. Furthermore, extant taxi services are expensive, slow, and not available everywhere. A car service like Uber would allow Pennsylvanians living outside of major metropolitan areas the freedom to travel within their own cities and towns without having to rely on a personal vehicle-- which many people either choose not to own or cannot afford to own-- and without having to rely on friends and family members to provide rides. This would reduce roadway congestion and improve the mobility of residents and visitors alike. I personally know many individuals living in Pennsylvania's smaller cities and towns who struggle to plan doctor's appointments and trips to the grocery store because of a lack of walkable options combined with a lack of public transportation. Uber will not solve all of these problems (affordable and extensive public transportation networks would be the ideal solution), but allowing Uber to operate throughout the state of Pennsylvania would present individuals with a far better transportation option than what is currently available.

Mary Kate Schneider
marykateschneider@hotmail.com
Zip Code 18049

Signature: *Mary Kate Schneider*

Email: marykateschneider@hotmail.com

Public transportation in our area of Pennsylvania (Lehigh Valley) is more or less non-existent. It has happened plenty of times that I take the Bieber bus from NYC to the Wescosville stop, and I have no way to get home. I would have to call a friend to pick me up. But when I arrive at midnight that is not a possibility, not even at 10PM. I have had to call a taxi and be driven home by a creepy driver with hardly a tooth in his mouth, and a smelly car on top of it. I have no idea who this guy is, yet he takes me home. I live in a very rural part of PA. It does not make me feel very safe. With Uber I have the name of the driver, and his phone number. Uber cars are clean, even have a bottle of water for their passengers. Uber drivers are courteous. To me it is a no-brainer to give the Pennsylvania residents the option to choose an Uber car. I'd take Uber over any taxi service around here.

Thank you.

Cynthia van Elk
cynthiavanelk@me.com
Zip Code 18066

Signature: 

Email: cynthiavanelk@me.com

I am from the Lehigh Valley. We need Uber in this area to help prevent drunk drivers. My sister was hit by a drunk driver in this area. Fortunately, she left the accident unharmed, but others in this area could not say the same thing. One of my best friends works at the casino in Bethlehem, PA. Her shift ends at 4a.m. Almost every night she calls the cops on someone who is driving recklessly on the highway most likely because they are intoxicated. I want safe, affordable, and reliable transportation in my area to help protect the people around here. Uber is a great service that I used in Orlando, FL and Philadelphia, PA. I would be extremely happy for Uber to bring their services to the Lehigh Valley.

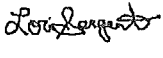
Lauren Sniscak
lauren.sniscak@gmail.com
Zip Code 18078

Signature: *Lauren M Sniscak*

Email: lauren.sniscak@gmail.com

This service would be an exceptional one, since our area is terrible for taxi drivers. I have heard nothing but complaints from people about how they HATE calling for a taxi here, because they take too long and sometimes never show up. As for me, this service would be beneficial because my husband is in a wheelchair and I can never go out and have fun, since I ALWAYS have to drive. It would be nice to finally have the opportunity to have transportation home! It would even be nice for my husband to get a ride. Also, this service would help to crack down on drunk drivers in our area!

Lori Sergent
lori@fazakas.net
Zip Code 18037

Signature: 

Email: lori@fazakas.net

I feel public transportation is severely lacking in a budding metropolis such as the Lehigh Valley. There is no subway. Busses are rare and unaccommodating with times. Most of all, it is very difficult to get a cab. The Lehigh Valley is home to two Philadelphia sport affiliates (Phillies & Flyers) as well as countless restaurants and bars. Getting home is often a hassle due to the lack of options and consistency in this area's public transportation sector.

William Seng
Wseng4@yahoo.com
Zip Code 18104

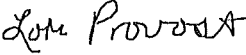
Signature: *William A. Seng*

Email: wseng4@yahoo.com

Yes! We need uber in the Lehigh Valley. We've been residents of this county for the past 35 years and our public transportation/cab system is abysmal. Having used uber in Oakland and LA, CA as well as Philadelphia, it makes me yearn for it in my own back yard. Our cab system particularly is unreliable and antique. Uber can bring so much more to our area.

Thank you.

Lori Provost
lorijprovost@gmail.com
Zip Code 18104

Signature: 

Email: lorijprovost@gmail.com

Uber is a great alternative to local cabs in the Lehigh Valley.. Knowing no cash is exchanged along with seeing a pic of the driver is the safest way to go. Used this service in other cities and is needed here in Allentown. Without a doubt it will cut down on the DUI problems.... We need Uber here now!!!

Craig Wendling
cwending6064@gmail.com
Zip Code 18078

Signature: *Craig P Wendling*

Email: cwending6064@gmail.com

Cab service in the Lehigh Valley is sparse and unreliable. Cab drivers I have used are less than professional. Prices seem high. Cab vehicles aren't clean, attractive or in good repair.

I have experienced excellent Uber service in Washington DC with clean, modern, efficient service, and very professional drivers.

Wendy Born
wendyborn@gmail.com
Zip Code 18103

Signature: *Wendy Born*

Email: wendyborn@gmail.com

Taxis and busses are almost non-existent where I live. Having ride-sharing would be extremely helpful as it would increase transportation availability.

Please allow ride sharing statewide.

Hallet Bruestle
bruestle2@gmail.com
Zip Code 18052

Signature: *Hallet Bruestle II*

Email: bruestle2@gmail.com

Cabs are unreliable currently, 1-3 hour waits for 5 minute drives. It is encouraging drunk driving. There are lots of great venues in the valley that would see lots of increased business with reliable transport.

Ryan Morrison
Arcersam@gmail.com
Zip Code 18062

Signature: *Ryan Morrison*

Email: arcersam@gmail.com

I work at an airport and there needs to be more options for travelers. price gauging happens because of a lack of competition.

there's a need for more ride share options as the Lehigh valley continues to grow.

Ashley H
ashleyhari@ymail.com
Zip Code 18062

Signature: *Ashley Hari*

Email: ashleyhari@ymail.com

It's not always easy to get a cab or some form of transportation at late nights & if we had uber in the Lehigh valley it would easier

Monae Rivera
Riveramonae@gmail.com
Zip Code 18102

Signature: *Monae Rivera*

Email: riveramonae@gmail.com

I live in Allentown, PA, and have personally needed a safe, flexible transportation option that public transport was not able to provide multiple times in the past.

However, looking to our city's exciting future with major renewal and construction happening downtown, I can only imagine how successful Uber would be around here. It could be awesome!!!

Come on, PUC, get with the future :-)

Helena Manzella
Hmanzella@gmail.com
Zip Code 18104

Signature: 

Email: hmanzella@gmail.com

I do not drive and when I am home from school in the summers, I have to rely on my parents for rides. The existing public transportation is not convenient at all. The bus stops are few and far between and do not go to areas where I would need to go. Where I am is not an area that accommodates pedestrians or bike-riders. There are no lanes nor side walks to adequately get me from point A to B. When my parents are busy at work or carting around my brother, I'm stuck staying at work for an extra two or three hours until they can come pick me up. I use uber when I'm in school, up in Boston, and it has never let me down. I have been hoping for something of the sort to come to Pennsylvania for some time. It would definitely help people in my situation as well as the 21+ community. As my friends are crossing that age boundary, I see the need for designated drivers go up, while people willing to step up does not. Uber would provide that safe alternative that could, not exageratingly, save lives.

Gillian Gipson
gllngipson@gmail.com
Zip Code 18069

Signature: *Gillian Gipson*

Email: gllngipson@gmail.com

I am a student at Muhlenberg College in Allentown, PA. We need better safe and reliable transportation options in my area of PA (Lehigh Valley). There are many colleges/universities in this area that would benefit tremendously from services like Uber. It can be difficult for students to go out and travel safely because there are few public transportation or (reliable) taxi services, and most nightlife is far from campus or in neighboring Bethlehem. Services like Uber would help these students and PA residents travel safely while supporting local businesses.

Benjamin Herbsman
bh246462@muhlenberg.edu
Zip Code 18104

Signature: *Benjamin Herbsman*

Email: bh246462@muhlenberg.edu

Taxi service in Allentown is unreliable. I personally know several people who have caused major damage while driving drunk in Allentown because they couldn't get a taxi.

Bring UBER to PA!!!

James Coker
james.coker@siemens.com
Zip Code 18104

Signature: *James Coker*

Email: james.coker@siemens.com

The Lehigh Valley needs UBER!! We do not have a reliable cab company here and with a very popular Sands Casino and bustling downtown Allentown, Bethlehem and Easton cultural areas, including sports and concert arenas, drinking and driving is a huge problem.

Please give us UBER!!!

Thank you!!!

XOXO

Ross Mabon
mabonr@gmail.com
Zip Code 8530

Signature: *Ross Mabon*

Email: mabonr@gmail.com

EXHIBIT C

STATEMENT OF FINANCIAL POSITION
Forecast from August 2014 to July 2015

REVENUE and GAINS

Operating Revenue 1,914,322

EXPENSES

Insurance 118,469
Legal 126,448
General Office Expense 2,066,390
Advertising Expense (and Marketing) 914,401
Materials and Supplies Expense 30,111
Total Operating Expense 3,255,819

NET INCOME (LOSS)

(1,341,497)

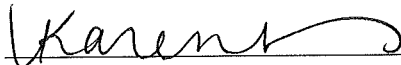
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Rasier-PA LLC, a Wholly	:	
Owned Subsidiary of Uber Technologies, Inc.,	:	
For Emergency Temporary Authority to Operate	:	Docket No. A-2014-
An Experimental Ride-Sharing Network Service	:	
Between Points in the Counties of Lehigh and	:	
Northampton, Pennsylvania	:	

VERIFICATION

I hereby verify that the statements made in this application are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

September 23, 2014



Karen O. Moury