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October 23, 2014

VIA ELECTRONIC FILING

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

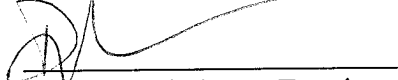
RE: C-2014-2444131

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Answer of Danielle Friedman to the Preliminary Objections of Uber Technologies, Inc. in the above-referenced matter.

Copies have been served on all parties as indicated in the attached Certificate of Service.

Sincerely,



Danielle Friedman, Esquire

DF/

Enclosure

cc: Chief Administrative Law Judge Charles E. Rainey, Jr. (via First-Class Mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DANIELLE FRIEDMAN v. UBER TECHNOLOGIES, INC.	Docket No. C-2014-2444131
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**DANIELLE FRIEDMAN’S ANSWER TO THE PRELIMINARY OBJECTIONS OF
UBER TECHNOLOGIES, INC.**

Complainant, Danielle Friedman, hereby responds to the Preliminary Objections of Uber Technologies, Inc. (“Uber”) as follows:

1. Denied as stated. It is admitted that Uber filed a timely Answer to the Complaint on October 14, 2014. Since the Complaint speaks for itself, the remaining averments in this paragraph are denied to the extent they are inconsistent with the Complaint.

2. Denied. The averments in this paragraph contain conclusions of law to which no response is required. By way of further answer, Complainant does have standing. Complainant is a shareholder in a dispatch company authorized by the Philadelphia Parking Authority (“PPA”) to dispatch taxicabs, including wheelchair accessible vehicles (“WAVs”).

3. Denied. The averments in this paragraph contain conclusions of law to which no response is required. By way of further answer, Complainant has a direct, immediate and substantial interest in the subject matter of the proceeding. Uber is unlawfully brokering transportation services for paratransit companies in Philadelphia. This has a direct and immediate impact on Complainant’s business. Uber is not licensed by the Pennsylvania Public Utility Commission (“PUC”) or the PPA to broker transportation services. The paratransit companies Uber has partnered with are prohibited from providing call or demand services as set forth in 52 Pa. Code 29.353. Complainant’s business is negatively impacted by Uber’s unlawful activities. Complainant’s business is authorized to broker transportation services and the WAVs in Complainant’s company are authorized to provide call or demand taxi service. Uber’s unlawful activities have a direct and immediate adverse impact on Complainant. The Complainant’s business holds authority which provides services similar to that which are being provided unlawfully provided by Uber. Under the circumstances, the application presents at

least a potential conflict. The PUC has recognized that standing arises not only from an actual conflict but also from potential conflict. *Application of Glen Alsace Water Company*, 45 Pa. PUC 472 (1971). Accordingly, the Complainant has standing.

4. Denied. The averments in this paragraph contain conclusions of law to which no response is required. By way of further answer, Complainant has a direct, immediate and substantial interest to establish standing as set forth in Paragraph 3 hereof.

5. Denied. The averments in this paragraph contain conclusions of law to which no response is required.

6. Denied. The averments in this paragraph contain conclusions of law to which no response is required.

7. Denied. The averments in this paragraph contain conclusions of law to which no response is required.

8. Denied. The averments in this paragraph contain conclusions of law to which no response is required.

9. Denied. The averments in this paragraph contain conclusions of law to which no response is required.

10. Denied. The averments in this paragraph contain conclusions of law to which no response is required.

11. Denied. The averments in this paragraph contain conclusions of law to which no response is required.

12. Denied. The averments in this paragraph contain conclusions of law to which no response is required.

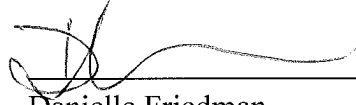
13. Denied. The averments in this paragraph contain conclusions of law to which no response is required. By way of further answer, as fully explained above in Paragraph 3, the Complainant has demonstrated that she is adversely affected by the actions in the Complaint, that there is a causal nexus between her asserted injury and the actions alleged in the Complaint, and that she has a discernable interest other than the general interest of all citizens in seeking compliance with the law.

14. Denied. The averments in this paragraph contain conclusions of law to which no response is required. By way of further answer, Complainant has a direct, immediate and substantial interest to establish standing as set forth fully in Paragraph 3.

15. Denied. The averments in this paragraph contain conclusions of law to which no response is required.

WHEREFORE, Complainant, Danielle Friedman, respectfully requests Uber's Preliminary Objections be denied.

Respectfully submitted,



Danielle Friedman

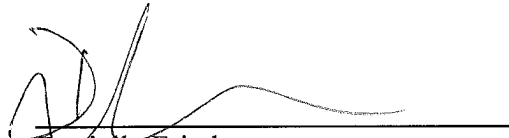
Dated: 10/23/14

CERTIFICATE OF SERVICE

I, Danielle Friedman, hereby certify that a true and correct copy of the foregoing document was served on the parties listed below in accordance with the requirements of § 1.54 (relating to service by a party).

Via First-Class Mail:

Karen O'Moury, Esquire
Buchanan Ingersoll & Rooney P.C.
409 North Second Street
Suite 500
Harrisburg, PA 17101-1357


Danielle Friedman

Dated: 10/23/14