



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

June 4, 2025

**Via Electronic Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement v.  
Rasier – PA LLC t/a Uber  
Docket No. C-2025-3054931  
**I&E Formal Complaint (Amended)**

Dear Secretary Homsher:

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement's (I&E) **Amended Motor Carrier Formal Complaint** in the above-captioned matter. This Amended Complaint supersedes the Motor Carrier Formal Complaint filed at the above docket on May 20, 2025.

This Amended Complaint revises the originally-filed complaint by removing the alleged violation regarding the age of the vehicle and revising the civil penalty sought from \$700 to \$200.

Copies are being served on parties as evidenced in the attached Certificate of Service. Should you have any questions, or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'mswindler'.

Michael L. Swindler  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 43319  
(717) 783-6369  
[mwindler@pa.gov](mailto:mwindler@pa.gov)

MLS/ac  
Enclosures

cc: Per Certificate of Service

## NOTICE OF MOTOR CARRIER COMPLAINT

- A. You must file an Answer within twenty (20) days of the date of service of this Complaint. The date of service is the mailing date as indicated at the top of the Secretarial Cover Letter for this Complaint and Notice, 52 Pa. Code §1.56(a). An Answer is a written explanation of circumstances wished to be considered in determining the outcome. The Answer should raise all factual and legal arguments that you wish to claim in your defense and must include the reference number of this Complaint. Your Answer must be verified and the original **mailed to**:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Or you may **eFile your Answer** using the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov). The link to eFiling is located under the Filing and Resources tab on the homepage. If your Answer exceeds 250 pages, you must also file a paper copy with the Secretary's Bureau.

In addition to filing your Answer with the Commission's Secretary, a copy should either be

Mailed to: Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 3W  
Harrisburg, PA 17120

Or, E-mailed to: [RA-PCCmplntResp@pa.gov](mailto:RA-PCCmplntResp@pa.gov)

- B. If you fail to answer this Complaint within twenty (20) days, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a penalty. The penalty could include a fine, the suspension or revocation of your certificate of public convenience, or other such remedy.
- C. You may elect not to contest this Complaint by paying the fine proposed in this Complaint by certified check or money order. **Payment must be made to "Commonwealth of Pennsylvania"** and forwarded to:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

- D. Your payment is an admission that you committed the alleged violation and an agreement to cease and desist from further violations. Upon receipt of your payment, the Complaint proceeding shall be closed.
- E. If you file an Answer, which admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request that the Commission issue a Secretarial Letter imposing a fine and/or other such remedy.
- F. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge (ALJ) for hearing and decision. The ALJ is not bound by the optional fine set forth above.
- G. Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION,  
BUREAU OF INVESTIGATION AND ENFORCEMENT

v.

RASIER – PA LLC T/A UBER  
ATTN: REGULATORY LEGAL  
UBER 3 WORLD TRADE CENTER  
175 GREENWICH ST, FLOORS 43-47  
NEW YORK, NY 10007

DOCKET NO. C-2025-3054931

**AMENDED MOTOR CARRIER COMPLAINT**

The Pennsylvania Public Utility Commission (“Commission” or “PUC”) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Investigation and Enforcement and other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, the Bureau of Investigation and Enforcement – Motor Carrier Division hereby represents as follows:

1. That Rasier – PA LLC t/a UBER, Respondent, maintains its principal place of business at Uber 3 World Trade Center, 175 Greenwich Street, Floors 43-47, New York, New York 10007.
2. That Respondent was issued a license by this Commission on January 26, 2017, at Application Docket No. A-2016-2580821, PUC Utility Code 6416478, authorizing transportation of persons for compensation in Transportation Network Company service.
3. That Respondent, on May 1, 2025, permitted a certain 2004 Hyundai SW bearing NJ registration number G68UVS and having vehicle identification number ending in the last 4 digits 7204 to be operated by driver Erol Baral.
4. That the vehicle described in numbered paragraph 3, above, was inspected on that date by PUC Motor Carrier Enforcement Officer Andrew Rosenberger on Airport Boulevard, Findley Township, Allegheny County. Officer Rosenberger determined that at the time of the inspection, the vehicle in question had the following violation: Two front steer tires, when tire depth was measured, had tread depth less than 2/32-inch.”
5. That Respondent, by allowing a vehicle to be operated with front steer tires with two adjacent tread grooves with less than 2/32-inch tread remaining, has violated 66 Pa.C.S. §2604.3(a), ref. 67 Pa. Code §175.80(e)(1)(i). The penalty for this violation is \$100 per violation for a total of \$200.

**WHEREFORE**, the Bureau of Investigation and Enforcement hereby requests that the Commission fine Rasier - PA LLC t/a UBER, the sum of seven hundred dollars (\$200.00) for the illegal activity described in this Complaint and order such other remedies as the Commission may deem to be appropriate.

Respectfully submitted,



Brian B. Mehus, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement  
400 North Street 2<sup>nd</sup> Floor  
Harrisburg, PA 17105-3265

**VERIFICATION**

I, Brian B. Mehus, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect that the Bureau will be able to prove same at any 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.

Date: June 4, 2025



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Brian B. Mehus, Chief  
Motor Carrier Enforcement  
Bureau of Investigation and Enforcement

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2025-3054931
	:	
Rasier – PA LLC t/a Uber	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Formal Complaint (Amended)** in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by party):

**Served via Certified Mail**

Rasier – PA LLC t/a Uber  
Attn: Regulatory Legal  
Uber 3 World Trade Center  
175 Greenwich Street, Floors 43-47  
New York, NY 10007

**Served via Electronic Mail and Certified Mail**

John F. Povilaitis, Esq.  
Buchanan Ingersoll & Rooney  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101-1357  
[john.povilaitis@bipc.com](mailto:john.povilaitis@bipc.com)



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Michael L. Swindler  
Deputy Chief Prosecutor  
PA Attorney ID No. 43319  
Bureau of Investigation and Enforcement  
(717) 783-6369  
[mwindler@pa.gov](mailto:mwindler@pa.gov)

Dated: June 4, 2025