

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PAEA SECTION 802(c) REQUEST

Docket No. PI2010-2

REQUEST OF THE UNITED STATES POSTAL SERVICE FOR THE COMMISSION
TO CONDUCT A REVIEW PURSUANT TO PAEA SECTION 802(c)
OF OPM DETERMINATIONS REGARDING CSRS
(February 23, 2010)

Pursuant to Section 802(c), Postal Accountability and Enhancement Act, Pub. L. No. 109-435, 120 Stat. 3250-51 (2006), the Postal Service requests that the Commission initiate a review of determinations made by the Office of Personnel Management (OPM) regarding the Postal Service's Civil Service Retirement System (CSRS) liabilities. The matters which the Postal Service wishes to have reviewed are those raised in a recent report of the Postal Service's Office of the Inspector General (OIG), "The Postal Service's Share of CSRS Pension Responsibility" (Jan. 20, 2010).¹

Section 802(c) of the PAEA contemplates that, upon receiving such a request from the Postal Service, the Commission will procure the services of an actuary to provide a report, which the Commission, after appropriate review and comment, will submit to the Postal Service, OPM, and Congress. OPM then will have the opportunity to reconsider its determination in light of the report. The conclusions reached by the OIG report raise serious questions as to the appropriate calculation of CSRS liabilities, with the magnitude of the amounts involved more than sufficient to color any serious

¹ The report is available at http://www.uspsoig.gov/foia_files/RARC-WP-10-001.pdf.

debate on the true state of the Postal Service's present and future financial health. Therefore, the Postal Service respectfully requests that the Commission initiated the procedures set forth in Section 802(c) of the PAEA. If the Commission believes that any further information from the Postal Service would be useful, the Postal Service will be happy to provide the information at its disposal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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