

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

Periodic Reporting

Docket No. RM2003-3

MOTION OF UNITED STATES POSTAL SERVICE
FOR EXTENSION OF TIME TO FILE COMMENTS

(April 2, 2003)

On January 8, 2003, the Postal Rate Commission issued Order No. 1358, soliciting comments on proposed changes in Rule 102 regarding periodic reporting requirements. On February 10, 2003, the Postal Service filed initial comments limited to a request for informal discussions with the Commission's staff regarding technical and other issues. The Postal Service indicated that it would file substantive comments following the informal talks. On February 12, 2003, the Commission issued Order No. 1360, authorizing the Postal Service to hold an informal technical conference "with the Commission's technical staff and the interested public." On March 11, 2003, the Postal Service hosted the informal conference, which helped to clarify the intent behind specific requirements of the proposed rules, the scope and breadth of information likely to be needed to satisfy the new rules, and the extent to which the Commission expected to publicly disclose the information produced. On March 14, 2003, the

Commission issued Order No. 1363, directing the Postal Service to file a second set of comments addressing the Notice of Proposed Rulemaking, and reflecting the information gained at the technical conference by April 3, 2003. The Commission also requested that the Postal Service address in its comments a number of additional items not included in the Notice of Proposed Rulemaking.

Based, in part, on the information and clarification received at the informal technical conference, the Postal Service has determined that the proposed amendments could have significant implications affecting, among other things, the respective roles of the Postal Service and the Commission, the Postal Service's ability to maintain the confidentiality of commercially sensitive business information in a competitive marketplace, and the availability and utilization of staff time and resources.

Despite diligence in pursuing this matter, a variety of factors, including the technical nature of the issues and the schedules of key staff, officers, and the Board of Governors, have impeded full and expeditious consideration of the proposed rules at the necessary levels of management. Consequently, the Postal Service regrettably finds that it needs additional time to formulate its comments

Therefore, for the reasons mentioned, the Postal Service requests an extension of time in which to file its comments in this Docket until May 9, 2003. The Postal Service is aware of no circumstances that would compel more rapid consideration of the issues in this docket, and believes that the benefits of a more full and deliberate

review within the Postal Service will lead to a better informed and considered rulemaking.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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April 2, 2003

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.

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