

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Request to Add Private Address Forwarding To the Market
Dominant Product List

Docket No. MC2013-60

PETITIONER'S MOTION FOR SCHEDULE EXTENSION DUE TO GOVERNMENT
SHUTDOWN AND URGENT RECONSIDERATION OF ORDER NO. 1838

October 1, 2013¹

1. Extension of schedule to accommodate government shutdown

Today, the PRC shut down due to Congressional failure to pass appropriations. As of this writing it is unknown how long the shutdown will last.

I therefore respectfully request that the PRC, when it resumes operations, immediately order an extension all scheduled dates on this docket by the number of days of government shutdown that occurred, plus two (to cover time consumed in shutting down and resuming operations).

I extend this request to the USPS' 28 day reply deadline mandated by 39 CFR 3020.54, as I believe the USPS has incurred a delay outside its control and should reasonably be allowed 28 days of actual operation to draft its reply. I believe that the 39 CFR 3020.54 deadline exists essentially to protect *my* right to have my petition heard speedily. Given the extraordinary circumstances, I hereby waive that right to the extent necessary in order to fulfill this request.

¹ October 1 is the date of my writing and online submission of this motion. Per the Commission's contingency plan on its website, "[a]ll filings submitted during the shutdown will be processed and posted to the Commission's website when the Commission resumes normal operations."

2. **URGENT** reconsideration of scheduling to permit *informed* public comment

I gave the Commission a deadline of October 2, 2013 to respond to the first portion of my previous motion. Due to the PRC's shutdown, I hereby extend that deadline to **3 days after this motion is filed** and the PRC is again operational.

I would like to reiterate that this deadline is forced on me by the PRC's unexplained action². I believe that it would be detrimental to disseminate this proposal before the USPS' initial reply is published, but that it would be even more detrimental not to provide the public a fair chance to hear about and respond to this proposal at all. Under the current scheduling, they have increasingly little time to do so.

If the Commission fails to act immediately to extend that schedule as I requested, I will have to assume that the deadlines will not change, and that I must therefore widely disseminate this proposal immediately — even though doing so would be detrimental to our mutual interest in having *informed* public comment.

Therefore, I respectfully request that in considering this motion, the Commission *immediately* act explicitly either to approve or deny the scheduling requested in part 1 of my previous motion³, and provide an explanation for the implicit denial of my request in Order No. 1838.

Sincerely,
Sai
Petitioner

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² As the PR noted in their motion on September 24th, "Order No. 1838 notes [Petitioner's] request [for public comments after the USPS' reply], then denies the request without explanation by setting due dates for both the Postal Service's initial views and comments for October 16, 2013".

³ Again, with all dates given in that motion (e.g. the timeline on page 2) extended by the number of days of government shutdown plus two.