

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

ANNUAL COMPLIANCE REVIEW, 2018

Docket No. ACR2018

MOTION OF THE UNITED STATES POSTAL SERVICE FOR PARTIAL
WAIVER OF RULE 3050.21(I) REGARDING INBOUND SHAPE DATA
(December 13, 2018)

The United States Postal Service hereby moves for partial waiver of Rule 3050.21(I). With respect to the ACR, that provision requires the Postal Service to:

(I) For the Inbound Letter Post product, provide revenue, volume, attributable cost, and contribution data by Universal Postal Union country group and by shape for the preceding the fiscal year subject to review and each of the preceding four fiscal years;

In the context of the ACR for FY 2018, this provision would require the submission of data for Fiscal Years 2014 through 2018. When the Commission first contemplated this requirement, however the Postal Service noted that its ability to comply would be constrained by the potential unavailability of historical data. See United States Postal Service Comments Regarding Order No. 4706 (Docket No. RM2018-2, August 17, 2018) at 9. In response, when nonetheless adopting the rule, the Commission on page 18 of Order No. 4836 (September 25, 2018) stated:

To the extent that the Postal Service lacks a full 5-year accounting of shape-based data, the Commission notes that the Postal Service is able to request the exclusion or partial exclusion of that component of the reporting requirement until such time that shape-based data becomes available for an entire 5-year period.

In accordance with the Commission's suggestion, the Postal Service hereby requests the partial exclusion of the shape-based component for all years prior to FY 2017.

Shape-based data applicable to the ICRA were first generated by the Postal

Service when submitting Proposal Five in Docket No. RM2018-8, as discussed on pages 2-3 of the June 26, 2018 Petition in that docket. Those data pertained to FY 2017. Comparable data for previous years are not available. Therefore, for purposes of the FY 2018 ACR, the Postal Service requests that it be exempted from providing the required shape-based data for any years prior to FY 2017. Similarly, the Postal Service requests that this partial exemption be extended for future ACRs covering FY 2019 and FY 2020. With shape-based data unavailable for years prior to FY 2017, it will not be until filing the ACR for FY 2021 that the Postal Service will be able to comply with the full five-year requirement imposed by Rule 3050.21(l).

Therefore, the Postal Service respectfully requests that the Commission grant a partial exemption of the shape-based component of the reporting requirement until such time that shape-based data become available for an entire 5-year period.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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December 13, 2018