

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

COMPETITIVE PRODUCT PRICES
INBOUND COMPETITIVE MULTI-SERVICE AGREEMENTS WITH
FOREIGN POSTAL OPERATORS
INTERCONNECT REMUNERATION AGREEMENT – UNITED STATES
POSTAL SERVICE AND SPECIFIED POSTAL OPERATORS
(MC2010-34)
NEGOTIATED SERVICE AGREEMENT

Docket No.
CP2020-141

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LEAVE TO RESPOND
TO COMMENTS FILED BY THE PUBLIC REPRESENTATIVE
(June 10, 2020)

The United States Postal Service (Postal Service) moves for leave to respond to the comments filed in this docket by the Public Representative on June 1, 2020.¹ The Postal Service requests leave to file a response addressing the issues raised by the Public Representative. Acceptance of a response would enhance the Postal Regulatory Commission's (Commission's) ability to evaluate the criticisms of the Postal Service's Notice advanced by the Public Representative in her comments, and create a more complete record for consideration of the Postal Service's Notice.² The Postal Service respectfully requests, therefore, that the Commission grant this Motion. For ease and efficiency, the Postal Service will file its response comments concurrent with this Motion.

¹ Public Representative Comments, Docket No. CP2020-141, June 1, 2020.

² See Notice of United States Postal Service of Filing Functionally Equivalent Inbound Competitive Multi-Service Agreement with Foreign Postal Operators, Docket No. CP2020-141, May 15, 2020 (Notice).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business and Service Development
Corporate and Postal Business Law Section

Mikhail Raykher
Attorney

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1101
(202) 268-4277
Mikhail.Raykher@usps.gov
June 10, 2020