

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

Before Commissioners:

Robert G. Taub, Chairman;
Michael Kubayanda, Vice Chairman;
Mark Acton;
Ann C. Fisher; and
Ashley E. Poling

Market Test of Experimental Product –
Extended Mail Forwarding

Docket No. MT2020-2

ORDER AUTHORIZING EXTENDED MAIL FORWARDING MARKET TEST

(Issued July 20, 2020)

I. INTRODUCTION

On June 8, 2020, the Postal Service filed a notice, pursuant to 39 U.S.C. § 3641 and 39 C.F.R. part 3045, announcing its intent to conduct a market test of an experimental product called Extended Mail Forwarding.¹ For a fee, Extended Mail Forwarding will provide customers who submit a permanent change-of-address (COA) request with the option of extending forwarding of all First-Class Mail, First-Class Package Service Commercial, and Priority Mail mailpieces beyond the 1 year forwarding period. Notice at 2.

¹ United States Postal Service Notice of Market Test of Experimental Product – Extended Mail Forwarding, June 8, 2020 (Notice).

The Commission finds that the Extended Mail Forwarding market test meets the requirements of 39 U.S.C. § 3641 and 39 C.F.R. part 3045 and therefore authorizes the market test to proceed. The Extended Mail Forwarding market test is intended to begin August 1, 2020, and run for 2 full years, unless extended or cancelled. *Id.* at 3. The Postal Service shall file data collection reports within 40 days after the close of each fiscal quarter during which the market test service is provided.

II. BACKGROUND

On June 8, 2020, the Postal Service filed the Notice proposing the Extended Mail Forwarding market test. The Postal Service asserts that Extended Mail Forwarding will ensure that customers receive mailpieces for which they are the intended recipient and which is more essential than ever before in light of the Coronavirus-19 pandemic. *Id.* It states that customers will exercise greater control over their mail forwarding expiration dates to better fit their needs with more time to update and communicate with their mailing contacts. *Id.* The Postal Service also asserts that Extended Mail Forwarding will provide cost savings for the Postal Service because the cost of forwarding mailpieces is less than the cost of handling undeliverable as addressed mailpieces. *Id.* at 3-4.

The Postal Service states that Extended Mail Forwarding will be available to customers when they submit their permanent COA request. *Id.* at 2. After that time, customers would be able to request and pay for Extended Mail Forwarding either up until the end date of the market test or within 18 months of submitting their initial COA request, whichever comes first. *Id.* Customers requesting an extension online will need to provide the 16-digit confirmation number associated with their initial COA request and their new ZIP Code. *Id.* at 2-3. Online requests will incur a credit card authentication fee only to verify the customer's identity for the COA request submitted online. *Id.* at 1. Extension requests at retail post office locations will require a government-issued identification, the 16-digit confirmation number associated with the initial COA request,

street number of the old address, the first two characters of their last name/business on the COA request, and ZIP Code of the old or new address. *Id.* at 3.

The Postal Service states that Extended Mail Forwarding will be tested in nine postal districts throughout the country that represent a cross-sample of COA requests by volume according to FY 2019 data.² Customers submitting permanent COA requests in these districts during the market test will be eligible to participate in the market test. *Id.*

The Postal Service plans to offer initial pricing for Extended Mail Forwarding of \$19.95 for one 6-month extension, \$29.95 for two 6-month extensions, and \$39.95 for three 6-month extensions. *Id.* at 2. Any customer who signs up initially for one or two extensions for \$19.95 or \$29.95 would be able to request additional extensions up to a total of three 6-month extensions for \$19.95 for each extension. *Id.*

The Postal Service intends for the market test to run for 2 full years beginning on August 1, 2020. *Id.* at 3. To better understand the results of the market test, the Postal Service asserts that it will collect the following data on a quarterly basis: number of extension requests; number of customers and ratio of individuals, families, and businesses; volume of mailpieces forwarded; and revenues. *Id.* at 6. The Postal Service also states that it will collect data on the attributable costs of Extended Mail Forwarding, including administrative costs of the test. *Id.*

III. PROCEDURAL HISTORY AND COMMENTS

The Postal Service filed the Notice on June 8, 2020. The Commission noticed the filing and gave interested persons the opportunity to submit comments on whether the Postal Service's filing is consistent with the requirements of 39 U.S.C. § 3641 and 39 C.F.R. part 3045.³ The Commission received comments from the Public

² *Id.* The nine postal districts located throughout the country are Alabama, Dakotas, Dallas, Northern New Jersey, Northland, Ohio Valley, Sacramento, San Diego, and Santa Ana. *Id.*

³ Notice and Order Concerning Market Test of Experimental Product – Extended Mail Forwarding, June 9, 2020 (Order No. 5539).

Representative and the Association for Postal Commerce (PostCom).⁴ The commenters support the market test and ask the Commission to approve it.

The Public Representative concludes that the proposed market test complies with the requirements of 39 U.S.C. § 3641(b). PR Comments at 4-5. He agrees with the Postal Service's assertions that Extended Mail Forwarding is a significantly different product from both the Premium Forwarding Service Competitive product and Commercial PO Box Redirect Service. *Id.* at 4. The Public Representative also believes that the Postal Service has adequately addressed the issue of unfair competition or otherwise inappropriate competitive advantage for itself or any mailer and has satisfied the requirements of 39 U.S.C. § 3641(b)(2) and 39 C.F.R. § 3045.3(a)(2)(ii). *Id.* He further believes that the Postal Service has complied with 39 U.S.C. § 3641(b)(3) and 39 C.F.R. § 3045.3(a)(2)(ii) regarding its characterization of the product as Market Dominant. *Id.* at 5. The Public Representative expresses concern that the market test service may continue for many months beyond the 2-year duration, or the 3-year limit if extended, for market tests with a possible total of 30 months beyond the end of the 2-year test period and well beyond the statutory limitation for market tests.⁵ He states these questions should be addressed before the test is implemented. *Id.* at 6.

The Public Representative notes that the Postal Service acknowledges its intention to comply with the annual revenue limitation and its obligation to seek an increase if needed. *Id.* at 7. He also believes that the Postal Service has complied with the requirement in the Commission's rules to provide a geographic market description. *Id.*

⁴ Public Representative Comments, June 30, 2020 (PR Comments); Comments of the Association for Postal Commerce, June 30, 2020 (PostCom Comments).

⁵ *Id.* at 5-6. For instance, if a COA is requested and paid for on the last day of the 2-year market test, forwarding will commence for 1 year under the COA plus 18 months for Extended Mail Forwarding for a total of 30 months beyond the end of the statutory 2-year test period.

PostCom supports the Extended Mail Forwarding market test and asserts that it complies with the applicable statutory requirements and should be approved as proposed. PostCom Comments at 1. It congratulates the Postal Service for its efforts to experiment with new products, but offers suggestions for obtaining more useful information to guide future product and pricing decisions. *Id.* PostCom asserts that there are lost opportunities for understanding customer preferences and behavior. *Id.* at 1-2. For instance, it states that these test options are severely limited. *Id.* at 2. Mail forwarding extensions of varying length, greater number, or indefinite or automatic renewal might have been offered to test consumer preferences. *Id.* It states that customer price sensitivity could be measured better if different prices were offered in different markets or to different types of groups or movers. *Id.* Such price variations would increase the utility of data collected and gain better insights into customer preferences. *Id.* at 3. PostCom also notes that returning undeliverable mail not only degrades the mail experience for senders and recipients but also increases costs. *Id.* PostCom suggests there may be an opportunity to reduce costs and improve service by forwarding mail indefinitely. *Id.* at 3-4.

IV. COMMISSION ANALYSIS

Based on a review of the record—including the Postal Service’s filing and the comments received—the Commission concludes that the Extended Mail Forwarding market test meets the requirements of 39 U.S.C. § 3641 and 39 C.F.R. part 3045. Accordingly, the market test is authorized to proceed. Below, the Commission analyzes applicable statutory and regulatory provisions to show that the Extended Mail Forwarding market test meets these requirements.

A. 39 U.S.C. § 3641(b) Requirements

The Postal Service may not test an experimental product under 39 U.S.C. § 3641 unless the experimental product satisfies three requirements in section 3641(b). As

discussed below, the Commission finds that the Extended Mail Forwarding experimental product meets these three requirements.

1. Significantly Different Product

An experimental product may not be tested under 39 U.S.C. § 3641 unless “[the experimental] product is, from the viewpoint of the mail users, significantly different from all products offered by the Postal Service within the 2-year period preceding the start of the [market] test.” 39 U.S.C. § 3641(b)(1). The Postal Service asserts that Extended Mail Forwarding is significantly different from all products offered by the Postal Service within the last 2 years. Notice at 4. The Postal Service explains that it has never offered customers the option of extended forwarding of permanent COA requests beyond 1 year, although Domestic Mail Manual § 507.2.1.2 offers Postmasters the discretion to extend that forwarding for an additional year if a customer demonstrates financial hardship. *Id.* The Postal Service states that it does not know how often customers request this extended service. *Id.*

The Postal Service asserts Extended Mail Forwarding differs from Premium Forwarding Service on the Competitive product list where mailpieces are delivered to an address, repackaged, and inducted back into the postal network for delivery to the forwarding address. *Id.* The other forwarding service is Commercial PO Box Redirect Service available only to Commercial PO Box customers that redirects automated First-Class Mail letters to a PO Box with Caller Service using a different postal system. *Id.* at 5.

The commenters agree that Extended Mail Forwarding is a significantly different product. PR Comments at 4; PostCom Comments at 1. The Public Representative states that the Postal Service has demonstrated Extended Mail Forwarding is significantly different from both Premium Forwarding Service and Commercial PO Box Redirect Service. PR Comments at 4.

After review of the Postal Service’s filing and the comments, the Commission finds that Extended Mail Forwarding is significantly different from all other products

offered by the Postal Service within the past 2 fiscal years and therefore satisfies 39 U.S.C. § 3641(b)(1).

2. Market Disruption

The Extended Mail Forwarding market test may not proceed unless the Commission finds that the “introduction or continued offering” of Extended Mail Forwarding will not create market disruption, which is defined as “an unfair or otherwise inappropriate competitive advantage for the Postal Service or any mailer, particularly in regard to small business concerns”⁶ “Introduction or continued offering” requires the Commission to evaluate market disruption both at the beginning of the market test and throughout the duration of the market test to ensure continued compliance with 39 U.S.C. § 3641(b)(2). Based on the record before it, the Commission finds no indication that the introduction of Extended Mail Forwarding will cause market disruption.

The Commission applies a four-step framework for analyzing market disruption.⁷ The first step of the market disruption analysis is to identify the relevant market for the Extended Mail Forwarding market test. Order No. 2224 at 9-10. For market tests, the relevant market is identified by examining the description of the experimental product and the geographic area(s) where the Postal Service intends to offer the experimental product during the market test duration. *Id.* at 9.

Customers may request and pay for Extended Mail Forwarding service during the market test when they submit their permanent COA request. Thereafter, customers may request and pay for Extended Mail Forwarding service up until the end of the market test or within 18 months of submitting their initial COA request, whichever comes first. Notice at 2. Extension requests will be accepted at USPS.com, at retail post office locations, and at self-service kiosks in select post offices from customers who file a

⁶ 39 U.S.C. § 3641(b)(2). “Small business concern” is defined in 39 C.F.R. § 3010.101(t).

⁷ See Docket No. MT2014-1, Order Authorizing Customized Delivery Market Test, October 23, 2014, at 9-12 (Order No. 2224).

permanent COA request. Notice at 2-3. Therefore, the relevant market for the Extended Mail Forwarding market test is permanent COA customers wishing to extend mail forwarding for First-Class Mail, First-Class Package Service Commercial, and Priority Mail mailpieces beyond 1 year up to an additional 18 months in designated districts throughout the United States.

The second step of the market disruption analysis is to identify businesses that offer similar products or services in the relevant market. Order No. 2224 at 10. The Postal Service points out that no other business offers a similar product or service because only it forwards mail through a permanent COA request. Notice at 5. The Commission agrees with this assessment.

The third step of the market disruption analysis is to evaluate whether the introduction or continued offering of the experimental product will create “an unfair or otherwise inappropriate competitive advantage for the Postal Service or any mailer” with regard to the businesses identified in step 2. See 39 U.S.C. § 3641(b)(2); Order No. 2224 at 10. In this case, the Commission must determine whether Extended Mail Forwarding will provide an unfair or otherwise inappropriate competitive advantage with regard to the Postal Service or any other provider.

The Postal Service asserts that Extended Mail Forwarding “will not create an unfair or otherwise inappropriate competitive advantage for the Postal Service or any mailer” as required by 39 U.S.C. § 3641(b)(2). Notice at 5. It explains that all individuals, families, and businesses who are eligible to file a permanent COA request either moving from or into the nine districts where the test will be conducted may participate. *Id.* It contends that, because only the Postal Service forwards mail under a COA request, no business offers a similar product or service. *Id.* It states the only impact on small businesses is to provide them with the option of extending their forwarding request should they permanently change addresses. *Id.*

The Public Representative states that the Postal Service has adequately addressed the unfair competition issue and satisfies 39 U.S.C. § 3641(b)(2) and 39 C.F.R. § 3045.2(a)(2)(ii), and PostCom concludes the market test complies with all

applicable statutory requirements. PR Comments at 4; PostCom Comments at 1. The Commission has analyzed the Notice and based on this review and evaluation of the comments, the Commission finds that the introduction of the Extended Mail Forwarding experimental product “will not create an unfair or otherwise inappropriate competitive advantage for the Postal Service or any mailer” because only the Postal Service forwards mail under a permanent COA request.

The fourth step of the market disruption analysis involves examining the impact of the market test on “small business concerns,” as defined in 39 C.F.R. § 3010.101(t), in the relevant market. Order No. 2224 at 11. The Commission finds reasonable the Postal Service’s assertions that the only impact on small businesses is the additional options to be available for their permanent COA requests. While not dispositive, no small business opposes the market test. Furthermore, 39 U.S.C. § 3641 and 39 C.F.R. part 3045 contain additional safeguards to ensure that market disruption will not occur. Market tests are limited in duration, and the Commission is authorized to limit the amount of revenue the Postal Service may obtain from any particular geographic market as necessary to prevent market disruption. 39 U.S.C. § 3641(d), (e)(1); 39 C.F.R. §§ 3045.10, .17. If necessary, the Commission may also cancel the market test or take other action that it deems appropriate. 39 U.S.C. § 3641(f); 39 C.F.R. § 3045.12.

Applying the framework discussed above, the Commission finds that the record contains no indication that the introduction of Extended Mail Forwarding will “create an unfair or otherwise inappropriate competitive advantage for the Postal Service or any mailer, particularly in regard to small business concerns” 39 U.S.C. § 3641(b)(2). Extended Mail Forwarding therefore satisfies the “market disruption” condition in 39 U.S.C. § 3641(b)(2).

In accordance with section 3641(b)(2), while this market test is ongoing, the Commission will evaluate whether the “continued offering” of the Extended Mail Forwarding experimental product creates market disruption. To assess continued compliance with section 3641(b)(2), the Commission will review data reported by the

Postal Service as part of the market test's data collection plan. See Section IV.B.3, *infra*.

PostCom suggests that there are opportunities for gathering more useful data by varying the terms of service and prices to obtain better insights in consumer preferences. PostCom Comments at 3. The Commission recommends that the Postal Service consider PostCom's comments as the market test progresses. If the Postal Service decides to change the market test, the Postal Service must notify the Commission at least 10 days before implementing any material changes to the market test or the services offered under the market test. 39 C.F.R. § 3045.6. Material changes are changes that may affect compliance with 39 U.S.C. § 3641 and include, without limitation, adjustments to prices, geographic scope, eligibility for service, or termination date. *Id.*

3. Correct Categorization

Section 3641(b)(3) of title 39 of the United States Code requires that the Postal Service correctly identify the experimental product as either Market Dominant or Competitive consistent with the criteria under 39 U.S.C. § 3642(b)(1). Section 3642(b)(1) states that Market Dominant products are products that "the Postal Service exercises sufficient market power that it can effectively set the price of such product substantially above costs, raise prices significantly, decrease quality, or decrease output, without risk of losing a significant level of business to other firms offering similar products. The competitive category of products shall consist of all other products." 39 U.S.C. § 3642(b)(1).

The Postal Service asserts that Extended Mail Forwarding is properly characterized as Market Dominant because the Postal Service controls forwarding within its network and a customer's only option for changing the address of record is by submitting a permanent COA request. Notice at 5-6. The commenters agree with the Postal Service's assertion that Extended Mail Forwarding is correctly characterized as Market Dominant. PR Comments at 3; see PostCom Comments at 1. The Commission

finds that the Postal Service has properly identified Extended Mail Forwarding as a Market Dominant product and therefore satisfies the “correct categorization” condition in 39 U.S.C. § 3641(b)(3).

B. Other Statutory and Regulatory Requirements

1. Duration

A market test may not exceed 24 months in duration unless the Commission authorizes an extension for up to an additional 12 months. 39 U.S.C. § 3641(d); 39 C.F.R. §§ 3045.10-11. The Postal Service states that it intends for the market test to begin on August 1, 2020, and to run for 2 full years. Notice at 3. The Extended Mail Forwarding market test is approved to begin on August 1, 2020, and will expire 2 years later on August 1, 2022, unless the market test is extended or cancelled.⁸

The Postal Service states that it may seek to extend the market test for an additional year or file a request to seek permanent product status early. Notice at 3. If the Postal Service seeks to extend the market test beyond August 1, 2022, it must file a written request for extension at least 60 days before the market test is scheduled to expire. 39 U.S.C. § 3641(d)(2); 39 C.F.R. § 3045.11. An extension request must meet the requirements of 39 U.S.C. § 3641(d)(2) and 39 C.F.R. § 3045.11. If the Postal Service seeks to add Extended Mail Forwarding to the Market Dominant product list as a non-experimental product based on an experimental product, the Postal Service must file a request that complies with 39 C.F.R. § 3045.18.

The Public Representative points out that actual operation of the test may extend well beyond the 2 or 3 years provided for market tests in 39 U.S.C. § 3641(d). For instance, customers would be able to purchase up to 18 months of forwarding extensions up until the last day of the 2-year market test period or up until the end of an additional 1-year extension if such extension is requested and granted by the

⁸ See 39 U.S.C. § 3641(d)(2) and 39 C.F.R. § 3045.11; 39 U.S.C. § 3641(f) and 39 C.F.R. § 3045.12.

Commission. In either case, the extended mail forwarding service could continue up to a total of 2.5 years beyond the end of the market test period; the original 1 year of mail forwarding plus 18 months of extensions. PR Comments at 5.

The Commission has reviewed the Notice and the Public Representative's comments regarding the time period for the Postal Service's market test including the period to be allowed for completing the service purchased and finds that latter aspect of the service to be reasonable and permissible. This is a market test and the ability of a customer to purchase the Extended Mail Forwarding service will only be available until the end of the 2-year test period or, if extended, a 3-year test period.

The market test is primarily intended to measure demand for the proposed service at the prices offered during the test period. In addition, this market test is expected to measure the volume of mail forwarded during the forwarding extension period, as well as to determine the cost of providing the forwarding services purchased. The nature of this market test requires that the service purchased and paid for as offered during the market test be provided for a period after the close of purchases in order to determine the market's interest in the Extended Mail Forwarding service test and its costs as well as savings in providing all of the services purchased during the test period. While, in this case, the Postal Service's activity to complete the services offered by the test may extend for a time period longer than usual after the offering to purchase terminates, postal services purchased are frequently paid in advance. Market tests often contemplate that the services purchased include processing and delivery activities to continue after the termination of the market test in order to conclude delivery or other services purchased during the market test. If it appears that completion of services offered extend unreasonably beyond the statutory period of a proposed market test, the Commission may take that into consideration when reviewing the market test application. In this case, the period of service is reasonable given the type and nature of services being offered.

2. Exemption from Revenue Limitation

Total revenues anticipated or received by the Postal Service from a market test in any fiscal year may not exceed \$10 million, as adjusted for inflation, unless the Commission grants an exemption. 39 U.S.C. § 3641(e); 39 C.F.R. §§ 3045.15-.16. The Postal Service asserts that volumes and revenues for Extended Mail Forwarding are difficult to predict as customer demand for this service is unknown. Notice at 6. It asserts that if revenues approach the limitation, the Postal Service will furnish appropriate notice to the Commission and submit an application for exemption under 39 U.S.C. § 3641(e)(2) in a timely manner. *Id.* The Public Representative notes that the Postal Service intends to comply with the statutory limits at 39 U.S.C. § 3641(e) and (g) and the regulatory limits in the Commission's regulations. PR Comments at 7. If the Postal Service seeks an exemption from the revenue limitation, the Postal Service must file its request for exemption at least 45 days before it expects to exceed the \$10 million revenue limitation, as adjusted for inflation. 39 C.F.R. § 3045.16(e). The inflation-adjusted market test revenue limitations are available on the Commission's website.⁹ The request for exemption must meet the requirements of 39 U.S.C. § 3641(e)(2) and 39 C.F.R. § 3045.16.

3. Data Collection Plan

The Notice includes a proposed data collection plan for the Extended Mail Forwarding market test as required by 39 C.F.R. § 3045.3(a)(2)(vi). Notice at 6. The Postal Service proposes to collect quarterly data on:

- Number of extension requests
- Number of customers and ratio of individuals, families, and businesses
- Volume of mailpieces forwarded
- Revenues

⁹ FY 2020 Market Test Revenue Limitations are available at: <https://www.prc.gov/sites/default/files/120520%20CPIweb.pdf>.

- Attributable costs of Extended Mail Forwarding, including administrative costs of the market test.

Id.

The Public Representative states that the Postal Service appears to meet the minimum data collection requirements of 39 C.F.R. § 3045.20, but recommends clarifying that data collection will be done in a manner which satisfies section 3045.20. PR Comments at 7. He also suggests requiring the Postal Service to include data from the market test in the Annual Compliance Report as contemplated by 39 C.F.R. § 3045.20(d). *Id.*

Consistent with 39 C.F.R. § 3045.20, the Postal Service must file the information in the data collection plan in quarterly data collection reports. See 39 C.F.R. § 3045.20(d). Data reported must be disaggregated by the district pricing areas for each of the five categories of data identified above. The Postal Service must file data collection reports within 40 days after the close of each fiscal quarter during which the market test is conducted, including the period following the termination of the market test while the services purchased are being provided.

The Commission will rely on the data collected by the Postal Service in its quarterly reports when evaluating any request for an extension or request to add Extended Mail Forwarding to the Market Dominant product list as a non-experimental product based on an experimental product. See 39 C.F.R. §§ 3045.11, .18, .20.

V. CONCLUSION

For the reasons discussed above, the Commission finds that the Extended Mail Forwarding market test meets the requirements of 39 U.S.C. § 3641 and 39 C.F.R. part 3045. The Extended Mail Forwarding market test is therefore authorized to proceed. The Extended Mail Forwarding market test will begin on August 1, 2020, and expire on August 1, 2022, unless extended or cancelled. The Postal Service must file data

collection reports, as described in the body of this Order, within 40 days after the close of each fiscal quarter during which the market test and service is provided.

VI. ORDERING PARAGRAPHS

It is ordered:

1. Based on the record before it, the Commission finds that the Extended Mail Forwarding market test is consistent with 39 U.S.C. § 3641 and 39 C.F.R. part 3045 and authorizes the market test to proceed.
2. The Extended Mail Forwarding market test will begin on August 1, 2020, and expire on August 1, 2022, unless the market test is extended or cancelled as described in the body of this Order.
3. The Postal Service shall file data collection reports, as described in the body of this Order, within 40 days after the close of each fiscal quarter during which the market test service is provided.
4. Revisions to the Market Dominant product list and the Mail Classification Schedule appear below the signature of this Order and are effective immediately.
5. The Secretary shall arrange for publication in the *Federal Register* of an updated product list reflecting the change made in this Order.

By the Commission.

Erica A. Barker
Secretary

CHANGE IN PRODUCT LIST

The following material represents changes to the product list codified in Appendix A to 39 C.F.R. part 3020, subpart A—Market Dominant Product List. These changes reflect the Commission's order in Docket No. MT2020-2. The Commission used two main conventions when making changes to the product list. New text is underlined. Deleted text is struck through.

Appendix A to Subpart A of Part 3020—Market Dominant Product List

Market Tests*

Extended Mail Forwarding

CHANGES TO THE MAIL CLASSIFICATION SCHEDULE

The following material represents a change to the Mail Classification Schedule. The Commission uses two main conventions when making changes to the Mail Classification Schedule. New text is underlined. Deleted text is struck through.

Part A—Market Dominant Products **1000 Market Dominant Product List**

Market Tests*

Extended Mail Forwarding

1800 Market Tests

1802 Extended Mail Forwarding

Reference

Docket No. MT2020-2

PRC Order No. 5591, July 20, 2020

Expires

August 1, 2022
