

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

PUBLIC INQUIRY ON THE UNIVERSAL SERVICE  
OBLIGATION VALUATION METHODOLOGY

Docket No. PI2021-1

**MOTION OF THE UNITED STATES POSTAL SERVICE TO DISCLOSE  
METHODOLOGICAL INFORMATION AND TO ADJUST PROCEDURAL SCHEDULE**  
(January 12, 2021)

In initiating this proceeding, the Commission solicited comments by March 15 “on any or all aspects of the Universal Service Obligation [(USO)] valuation methodology.” Order No. 5777, Notice and Order Providing an Opportunity to Comment with Respect to Universal Service Obligation Valuation Methodology, PRC Docket No. PI2021-1 (Dec. 10, 2020), at 9. The Commission publishes the results of its annual USO-valuation exercise in its annual report to the President and Congress. The valuation methodology was originally established in a 2008 Commission report, but a review of annual reports indicates that the Commission has made methodological changes from time to time. While the Commission’s annual reports briefly summarize the current methodology and may acknowledge changes, there is no public source that details the current methodology. Nor does the Commission publish workpapers that might afford transparency into its calculations.

The Postal Service commends the Commission for seeking public input on its methodology in this proceeding. However, it may be difficult for participants to adequately evaluate the current methodology and offer input without a more detailed sense of how the Commission currently calculates its USO valuation estimates. To aid participants in developing meaningful, informed feedback, the Postal Service

respectfully requests that the Commission post a detailed explanation of its current valuation methodologies and workpapers showing the calculations underlying its most recent USO valuation. Given that the Commission typically releases its annual report in January, the forthcoming report offers an opportunity to disclose methodological information that is particularly current.<sup>1</sup>

The Postal Service further submits that it would be appropriate for the Commission to defer the comment deadline to allow participants adequate time to evaluate the materials in preparing their comments. Since the USO valuation does not affect the rights of any party, and since the next valuation exercise (after the one that would occur prior to the current comment deadline) will not occur for another year, deferral of the comment deadline should not prejudice any party or the Commission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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<sup>1</sup> To the extent that the workpapers might include information that is commercially or law-enforcement sensitive or otherwise subject to protected status under the Commission's confidentiality rules, they could be posted non-publicly subject to the Commission's standard access conditions.