

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

PERIODIC REPORTING
(PROPOSAL ONE)

Docket No. RM2021-3

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
LEAVE TO FILE REPLY COMMENTS REGARDING PROPOSAL ONE
(May 11, 2021)

Order No. 5847 (March 16, 2021) established the procedural schedule in this proceeding and, while setting the date for initial comments at May 3, made no provision for reply comments. Pursuant to Order No. 5847, only one set of initial comments were filed on May 3, and those were submitted by the Public Representative (PR). The Public Representative appears to limit her evaluation of Proposal One to a recommendation that more information be submitted. The Postal Service requests leave to file reply comments addressing matters raised by the PR Comments.

Acceptance of those reply comments would enhance the Commission's ability to evaluate the claims advanced in the PR Comments, and thus create a more complete record for consideration of the Proposal. The Postal Service would otherwise have no opportunity to respond to those comments, or to address the alleged information deficiencies. The Postal Service reply comments are proffered in a separate pleading submitted concurrently.

Wherefore, the Postal Service respectfully requests leave to file reply comments

responding to the initial comments filed in the proceeding by the Public Representative.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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