

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Transferring Bound Printed Matter
Parcels to the Competitive Product List

Docket No. MC2021-78

**MOTION OF PARCEL SHIPPERS ASSOCIATION
FOR LEAVE TO FILE SURREPLY**

(September 8, 2021)

Parcel Shippers Association (PSA) respectfully submits this motion for leave to file surreply comments concerning responses to Commission Information Request No. 1 filed by the United States Postal Service on September 2, 2021 (Response). Although the Commission's rules do not authorize a response in this instance as a matter of right, the Commission may accept such a pleading as a matter of discretion in appropriate cases.¹ Good cause exists for allowing a response here. These responses provide information not previously available that relate directly to the issue at hand in this case. Does:

. . . the Postal Service exercise[] 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[?]*

See 39 U.S.C. § 3642(b)(1)(emphasis added).²

Acceptance of these comments will enhance the record and assist the

¹ See, e.g., Dkt. No. A2013-5, Order No. 1866 (Oct. 31, 2013) at 3, n.7 (allowing USPS surreply); Dkt. No. C2009-1, Presiding Officer's Ruling No. 23 (June 10, 2010) at 4, n.7.
² See Comments of the Parcel Shippers Association (May 17, 2021)(PSA Comments) at 1-2.

Commission in evaluating this issue and the arguments presented by the Parcel Shippers Association, the Postal Service, and other parties.

No party will be prejudiced by granting this motion.³

Respectfully submitted,

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³ See PSA Comments; Comments of the Association for Postal Commerce and MPA – The Association of Magazine Media (May 17, 2021); Comments of Scholastic, Inc. Opposing the Transfer of Bound Printed Matter Parcels to the Competitive Product List (May 17, 2021); United States Postal Service Request to Transfer Bound Printed Matter Parcels to the Competitive Product List (March 26, 2021) (USPS Comments).