

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

PERIODIC REPORTING
(PROPOSAL SIX)

Docket No. RM2021-9

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
LEAVE TO FILE REPLY COMMENTS REGARDING PROPOSAL SIX
(November 4, 2021)

Order No. 5992 (September 30, 2021) established the procedural schedule in this proceeding and, while setting the date for initial comments at October 28, made no provision for reply comments. Pursuant to Order No. 5992, the Public Representative and GCA filed initial comments on October 28, 2021. The Public Representative supports Proposal Six, but with a caveat regarding the unit delivery cost proxy. PR Comments at 2-3. The Postal Service requests leave to file reply comments addressing the matter raised by the PR Comments.¹

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 concern raised.

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

¹ The Postal Service reply comments are proffered in a separate pleading submitted concurrently. Because, however, the GCA Comments offer no opinion on the merits of Proposal Six (GCA Comments at 1, 6), the Postal Service does not attempt to address them in its reply comments.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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