

BEFORE THE
POSTAL REGULATORY COMMISSION

Periodic Reporting (Proposal One)

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Docket No. RM2022-3

MOTION OF UNITED PARCEL SERVICE, INC. FOR EXTENSION
TO FILE COMMENTS
(March 2, 2022)

United Parcel Service, Inc. (“UPS”) respectfully submits this motion for a two-week extension to file comments in Docket No. RM2022-3. The current deadline for interested persons to submit comments in this docket is March 14, 2022, with reply comments due on March 28, 2022.¹ If this motion is granted, interested persons would submit opening comments on March 28, 2022, and reply comments (if any) on April 11, 2022. UPS is preparing initial comments for this docket, and would benefit from the additional two weeks, and UPS submits that this short extension is warranted for several reasons.

First, on January 21, 2022, the Postal Service modified two of its non-public library references more than two weeks after they were initially filed.² UPS’s counsel and consultants have required some additional time to analyze these changes.

¹ Notice of Proposed Rulemaking on Analytical Principles Used in Periodic Reporting (Proposal One), Dkt. No. RM2022-3 (Jan. 10, 2022), at 4.

² See Notice of Minor Revisions to USPS-RM2022-3-1 and USPS-RM2022-3-NP1 – Errata, Dkt. No. RM2022-3 (Jan. 21, 2022).

Second, some proposed Information Requests remain pending. On February 23, the Public Representative filed a Motion for Issuance of Second Information Request.³ On February 25, UPS filed a Motion for Issuance of Information Request.⁴ The Commission has yet to rule on either of these motions, and the Postal Service has yet to provide information that would be responsive to the proposed information requests. The requested extension could allow interested parties to incorporate any responsive information into their comments.

Finally, this docket is very important, as it will directly affect cost attribution for nearly \$13 billion of the Postal Service's costs.⁵ Yet it is proceeding in parallel to several other significant dockets that are competing for the attention of interested parties, including the Appropriate Share docket.⁶ A modest extension of two weeks is justified to allow interested parties to submit thorough and well-reasoned comments. Accordingly, UPS requests that the Commission extend the deadlines for opening and reply comments by two weeks.

³ Public Representative Motion for Issuance of Second Information Request and Notice of Filing Under Seal, Dkt. No. RM2022-3 (Feb. 23, 2022).

⁴ Motion of United Parcel Service, Inc. for Issuance of Information Request to the United States Postal Service, Dkt. No. RM2022-3 (Feb. 25, 2022).

⁵ See Report of Prof. Michael D. Bradley, appended to Petition of The United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles, Dkt. No. RM2022-3 (Jan. 5, 2022), at 117.

⁶ See Supplemental Notice of Proposed Rulemaking and Order Initiating the Third Review of the Institutional Cost Contribution Requirement for Competitive Products, Dkt. No. RM2022-2 (Nov. 18, 2021) (soliciting comments from interested parties by Feb. 25, 2022, and reply comments by Mar. 25, 2022).

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

By /s/ Steig D. Olson

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