

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

PERIODIC REPORTING
(PROPOSAL ONE)

Docket No. RM2022-3

**MOTION OF THE UNITED STATES POSTAL SERVICE REQUESTING
AN ADDITIONAL ADJUSTMENT TO THE PROCECURAL SCHEDULE**
(March 3, 2022)

Order No. 6090 (January 10, 2022) set the procedural schedule for this proceeding with a deadline for initial comments of March 14, 2022, and a deadline for reply comments two weeks later on March 28, 2022. On March 2, UPS moved for a two-week extension of both deadlines, until March 28 and April 11. The next day, on March 3, 2022, the Commission granted the requested extension, setting those dates as the new deadlines. Order No. 6114 (March 3, 2022). The Postal Service hereby moves for a further adjustment of the procedural schedule that would match the two-week extension period granted for the initial comments with a corresponding adjustment to the interval allowed for the reply comments.

Order No. 6114 was issued as the Postal Service was preparing to submit its response to the UPS motion. The Postal Service agrees with UPS that the subject matter of this proceeding is important, and its resolution may affect the costing treatment of a major portion of accrued costs. Taking some additional time in pursuit of adequate opportunity for careful consideration of all aspects of the matter seems warranted. Second, the Postal Service also agrees with UPS that there are other important proceedings with schedules that overlap with the instant docket. For

example, while UPS cited the Appropriate Share docket as a potential conflict under the initial schedule, the Commission is anticipated to issue the Annual Compliance Determination in the same week that initial comments are now due in this docket under the adjusted schedule.

Because of its agreement with these supporting reasons, the Postal Service did not intend to oppose the request by UPS for a two-week extension in the time allotted for the preparation and submission of initial comments. Yet UPS did not propose, and Order No. 6114 thus did not address, any adjustment in what can only be described as the rather meager two-week interval allotted for development, preparation, and submission of reply comments under the initial schedule. With the longer period now allotted for the development of initial comments, the more certain it has become that the very short two-week period for the preparation of reply comments will become increasingly inadequate. Indeed, a critical factor in that regard remains unknown (at least to the Postal Service, and presumably to the Commission as well), which is whether parties will limit their initial pleadings to comments on the Postal Service's proposal based on the Postal Service's econometric analysis, or whether they will instead also offer their own econometric analyses in support of their own alternative proposals. If they pursue the latter option, then the period necessary to allow adequate development of reply comments inevitably must increase (relative to the circumstance of no alternative econometric models). That is particularly the case while it remains unknown how many alternative analyses (by how many parties) might be submitted. If multiple alternative proposals are submitted, then presumably all parties would benefit from an extension of time to respond in reply comments.

Therefore, since the Commission has granted the two-week extension in the period allotted for initial comments requested by UPS, the Postal Service respectfully suggests that the period allotted for reply comments be expanded by two weeks as well. That would result in adjusted dates of March 28 for initial comments, and April 25 for reply comments. Even if such an extension were granted, however, the Postal Service is compelled to caution that the scope of what gets filed as initial comments conceivably may require further consideration of an adequate reply period once that scope becomes known.

At this point, however, in view of the two-week extension granted for parties to prepare their initial comments, the Postal Service simply requests a corresponding two-week extension in the period set for preparation of reply comments (to a total of four weeks), with a requested due date for reply comments of April 25.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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