

BEFORE THE
POSTAL REGULATORY COMMISSION

Periodic Reporting
(Proposal One)

:
:
Docket No. RM2022-3
:

UNITED PARCEL SERVICE, INC.'S MOTION FOR LEAVE
TO FILE SUR-REPLY COMMENTS
(May 16, 2022)

Order No. 6119, Dkt. No. RM2022-3 (Mar. 11, 2022), reset the deadline for interested persons to file initial comments and reply comments addressing matters raised by Proposal One. Initial and reply comments were filed on March 28 and April 25, 2022.

In its Reply Comments¹ and in the accompanying report by Professor Michael Bradley,² the Postal Service proposes a modification to address an issue raised by UPS's Initial Comments concerning the need to update variabilities as mail volumes change in future years.³ UPS has analyzed this proposal with the benefit of the non-public data, and respectfully seeks leave to file short sur-reply comments about its

¹ Postal Service Reply Comments at 3.

² Michael D. Bradley, "Report on the Initial Comments of The Public Representative and United Parcel Service, Inc." April 25, 2022 ("Second Bradley Report")

³ See, e.g., UPS Initial Comments at 4. All commenters agreed that the concern raised by UPS is valid. See Postal Service Reply Comments at 2; Second Bradley Report at 20; Public Representative Reply Comments at 4; Amazon Reply Comments at 3; and GCA Reply Comments at 1.

findings. In brief, UPS supports the proposed modification because it helps address the issue that UPS had identified.

UPS's proposed sur-reply comments are filed along with this motion for leave as a separate docket entry. Acceptance of these sur-reply comments would facilitate the Commission's understanding and evaluation of the Postal Service's comments, and would thus create a more complete record for the Commission's consideration of the matters raised by Proposal One.

Wherefore, UPS respectfully requests leave to file the concurrently filed sur-reply comments responding to the comments of the Postal Service.

Respectfully submitted,

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