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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

PRESIDING OFFICER'S
RULING NO. R2000-1/30

UNITED STATES OF AMERICA
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes

Docket No. R2000-1

RULING ON MOTION FOR RECONSIDERATION
OF POIR NO. 5/QUESTIONS 1 AND 2

(Issued April 7, 2000)

This ruling addresses a Postal Service motion for reconsideration of two questions in a recent Presiding Officer's Information Request (POIR), or for other relief. Both questions seek revisions to certain information that witness Mayes has provided, due to errors in the material as filed.¹ See March 23, 2000 Motion of the United States Postal Service for Reconsideration of Questions 1 and 2 [in POIR No. 5 (issued March 14, 2000)] or, in the Alternative, for an Extension of Time to Respond ("Postal Service Reconsideration Motion").²

In support of its position, the Service asserts that developing the type of response it believes Question 1 calls for will require the efforts of several witnesses and entail a minimum of five work weeks to re-run the rollforward model. Postal Service Reconsideration Motion at 2. It also says a response to Question 2 requires re-running the rollforward model, and characterizes the impact of the changes that prompted the request as de minimis. *Id.* at 4.

¹ POIR No. 5/Question 1 seeks revised versions of Exhibit USPS-32A and of an attachment to witness Mayes' response to POIR No. 1/Question 4. These would incorporate the correct ("First") Tolley test-year before-rates (TYBR) volume forecasts for Regular, Nonprofit and Classroom Periodicals. POIR No. 5/Question 2 asks for updates to Exhibit USPS-32B and page 2 of the attachment to her response to POIR No. 1/Question 4 to reflect the witness Musgrave's correct test-year after-rates (TYAR) volume forecasts for Priority Mail and Express Mail.

² March 24, 2000 was the deadline for the Service's response.

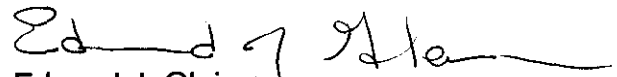
Given this time estimate and the limited scope of the Information Request, the Service questions whether the anticipated benefits will improve the record to a degree that warrants a complete re-run. *Id.* at 2-3. At the same time, the Service discounts the viability of providing “a less sophisticated” analysis, on grounds that this “would seem to be a vastly inferior alternative” because it would not improve upon the information already provided. *Id.* at 3. The Service also points out that the Commission’s “PRC version” is likely to eventually account for the changes. *Id.*

At the time the Information Request was issued, it was anticipated that responses to Questions 1 and 2 would require less than a day’s worth of work on purely mechanical exercises. In the face of the Service’s estimate, which I will accept for purposes of this ruling, other alternatives must be considered. However, it is clear the Service considers anything less than a complete run-through inadequate, so there seems little point in pursuing a less elaborate exercise at this time. This is especially the case when, as the Service indicates, there are other known corrections. See Postal Service Motion for Reconsideration at 2-3, fns. 3 and 4.

Under these circumstances, the Service will not be required to provide a response to the questions in issue at this time. However, the size and complexity of the R2000-1 record may mean that sound administration of this case requires a concise summary of revisions and their consequences. Accordingly, I anticipate asking the Service to address, in the period after hearings on its direct case, the impact on its filing of the revisions referred to in Questions 1 and 2 and of other corrections and adjustments that may be deemed necessary or appropriate. The precise nature and extent of the analysis will be determined later.

RULING

1. The Service's March 23, 2000 motion for reconsideration of POIR No. 5/Questions 1 and 2 (identified in the body of this ruling) is granted.
2. Explanation of the scope of the requested response and the date for submission will be provided at a later time.


Edward J. Gleiman,
Presiding Officer