

ORDER NO. 1363

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

Before Commissioners:

George Omas, Chairman;  
Dana B. Covington, Sr., Vice Chairman;  
Ruth Y. Goldway; and Tony Hammond

Periodic Reporting

Docket No. RM2003-3

NOTICE SETTING DATE FOR POSTAL SERVICE  
COMMENTS AND PUBLIC REPLY COMMENTS

(Issued March 14, 2003)

On January 8, 2003, the Commission issued Order No. 1358, a Notice of Proposed Rulemaking soliciting comments on proposed changes to the Commission's rule establishing periodic reporting requirements [39 CFR § 3001.102]. In its initial comments on the Notice of Proposed Rulemaking, the Postal Service indicated that it believed that an informal technical conference clarifying the objectives of these proposals and examining the potential burdens of complying with them would be beneficial. Initial Comments of the United States Postal Service, filed February 10, 2003, at 3-4.

In Order No. 1360, issued February 12, 2003, the Commission authorized the Postal Service to arrange such a conference and asked it to provide a list of items that it would like to address that would be publicly circulated. In Order No. 1361, issued March 5, 2003, the Commission gave notice that the conference would be held on Tuesday, March 11, 2003, at Postal Service Headquarters and posted the list of items that the Postal Service proposed to discuss. Order No. 1361 deferred the date for filing the Postal Service's formal comments and for the public to file reply comments pending the results of the technical conference.

At the technical conference, Commission staff responded to the list of concerns enumerated in the Postal Service's list. The conference clarified the Commission's goals and expectations for the proposed rule. It also gave the Commission staff a better understanding of the Postal Service's concerns about the burden and commercial sensitivity of the requested documentation. The Postal Service will be given 20 days from the publication of this notice to file a second set of comments that reflect the information gained at the technical conference. The public will have 10 additional days from the filing of those comments to file reply comments.

At the technical conference, the Postal Service noted that it disclosed data from its basic data systems in detail in the context of a general rate case even though it considers some of those data to be commercially sensitive. It expressed reservations about disclosing some of that detailed data more frequently, in the context of periodic reports. It would be helpful if the Postal Service's written comments listed the specific items that it considers to be commercially sensitive in the context of periodic reports, the reasons for its concerns, and explain what protective conditions would alleviate its concerns.

The Commission's staff asked whether it would be feasible to provide the output of the Postal Service's COBOL-based accounting system reports, such as the National Consolidated Trial Balance and the Payroll Hours Summary Report, in the form of ASCII text files that could be read by PC compatible software. The Postal Service promised to investigate that question. It would be useful if the Postal Service's comments discussed the results of that inquiry.

In the past, under Rule 102, the Alaska Air adjustment and transportation cost distribution keys were provided in transportation workpapers 31 and 57, respectively. While the proposed rule retains these references, they have become obsolete. The Postal Service agreed to identify the workpapers where this information is now located and provide updated references. The Commission requests that it include the updated references in its comments.

Finally, outside of the Rule 102 process, the Postal Service has provided the Commission each year a set of tables with the input data and calculations that it uses to produce its annual estimate of Total Factor Productivity. At the technical conference, the Commission staff suggested that it might be appropriate to include this information as one of the reports required under Rule 102. The Postal Service is requested to respond to this suggestion in its comments.

It is ordered:

1. The Postal Service's second set of comments addressing the Notice of Proposed Rulemaking that was issued in this docket on January 8, 2003 will be due on April 3, 2003.
2. The public will have until April 14, 2003, to file reply comments.

By the Commission  
(SEAL)

Steven W. Williams  
Secretary