

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

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PREMIUM FORWARDING SERVICE

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Docket No. MC2007-3

STATEMENT OF THE UNITED STATES POSTAL SERVICE  
CONCERNING COMPLIANCE WITH FILING REQUIREMENTS  
AND CONDITIONAL MOTION FOR WAIVER  
(July 31, 2007)

In the Compliance Statement (Attachment C) to its Request, the Postal Service has identified information contained in its testimony and supporting documentation intended to satisfy the filing requirements in pertinent provisions of the Commission's Rules of Practice and Procedure (Rules 54 and 64). The Postal Service has supplemented materials developed specifically for this proposal to make Premium Forwarding Service (PFS) a permanent classification by incorporating documentation submitted by the Postal Service in the most recently concluded omnibus rate proceeding, Docket No. R2006-1, as well as material filed periodically with the Commission. In light of several considerations, the Postal Service believes that most of the specific filing requirements are met by incorporating these materials. Alternatively, if the Commission concludes that the incorporated materials are insufficient to satisfy its filing requirements, the Postal Service moves for waiver of the pertinent provisions.

## **I. INCORPORATION OF DOCKET NO. R2006-1 MATERIAL**

The Postal Service's incorporation of Docket No. R2006-1 materials is justified by the fact that this proposal would not materially alter the rates, fees, and classifications established by that rate proceeding; nor would prices for PFS change. Furthermore, that docket's test year is also applied in this docket, and it substantially overlaps with the first year of permanent PFS described in the testimony. As outlined in the Request and the testimony, making PFS permanent would simply preserve an option for customers who temporarily relocate, and would have only a limited impact on overall postal costs, volumes, and revenues.

Certain filing requirements call for information pertaining to the full spectrum of postal products: e.g., Rule 54(b)(3) (economic substitutability between classes and subclasses); Rule 54(d) (physical attributes of mail by class and subclass); Rules 54(f)-(h) (total historical and projected costs separated by postal and nonpostal services and distributed to classes, subclasses, and special services); Rule 54(j) (revenues and volumes projected for classes, subclasses, and special services); and Rule 54(l) (billing determinants for classes, subclasses, and special services). These requirements are adequately addressed through reference to information provided in the most recent omnibus rate proceeding.

## **II. WAIVER OF FILING REQUIREMENTS**

If the Commission concludes that the materials imported from Docket No. R2006-1 and otherwise are insufficient to satisfy the general filing requirements, and that strict construction of the rules regarding information pertaining to other mail and special services would require testimony that was developed specifically with reference to the

proposal in this docket, the Postal Service respectfully moves that those requirements be waived, pursuant to 39 C.F.R. §§ 3001.22, 3001.54(r), and 3001.64(h)(3). As noted above, the proposal's limited nature and small impact on costs, volumes, and revenues do not warrant strict compliance with the filing requirements.<sup>1</sup>

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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<sup>1</sup> As reflected in the Compliance Statement, Attachment C to the Request, full or partial waivers may be appropriate for the following rules: 54(b)(3), 54(c), 54(d), 54(e), 54(f)(2)-(3), 54(h)(1)-(12), 54(i), 54(j)(1)-(7), 64(b)(1)-(4), 64(c)(1)-(3), 64(d), and 64(h).