

December 7, 2007

Postal Regulatory Commission
901 New York Avenue, N.W., Ste. 200
Washington, DC 20068

Re: Comment Deadline in Docket No. PI2008-1

Dear Mr. Chairman and Members of the Commission:

We write, on behalf of the Association of Postal Commerce (“PostCom”) to request that the Commission modify the deadlines for the submission of Comments and Reply Comments established Order No. 48 in this Docket. Specifically, we ask that the Commission issue an order specifying that Initial Comments may be submitted no later than 40 days after publication of Order No. 48 (including the materials submitted by the Postal Service referenced therein) in the *Federal Register* and that Reply Comments may be submitted not later than 14 days after the date on which Initial Comments are due. For the reasons set forth below, PostCom believes that modification of the comment schedule in this fashion is warranted in the interest of administrative fairness and that no party will be prejudiced by the relatively modest readjustment of the comment schedule we have proposed.

Order No. 48, issued on December 4, 2007, specifies that the date for the submission of Initial Comments is January 7, 2008 and Reply Comments are due on January 21, 2008. The Order further specifies that the Notice, together with the Postal Service’s voluminous service performance measurement proposal, are to be submitted for publication in the *Federal Register*. Even if publication in the *Federal Register* occurs within the next several days (and that seems uncertain), interested parties – including PostCom members – will have had a scant 30 days or less in which to examine, analyze and prepare comments for submission to the Commission in this docket. In fact, the actual available time under the schedule established in Order No. 48 is considerably less than 30 days because the schedule overlaps two, major national holidays, both of which fall on weekdays. PostCom is, therefore, concerned that the quality of the comments the Commission may receive will be impaired unless the comment schedule set forth in Order No. 48 is modified. This is especially true for interested persons who may not even become aware of this docket until publication in the *Federal Register*.

We are mindful of the Commission’s and the Postal Service’s desire to complete the rulemaking mandated by section 3691 of the PAEA as expeditiously as possible. At the same time, the Commission has recognized that the matters to be addressed in this docket are of great importance to the mailing community. The modest modification of the comment schedule we

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have proposed will permit interested parties to meaningfully deal with the important issues presented without material prejudice to the goal of completing this docket in a prompt and orderly fashion.

PostCom therefore respectfully submits that the comment schedule in Docket PI2008-1 be adjusted so that (i) Initial Comments are due not later than 40 days after publication of this docket in the *Federal Register*, and (ii) Reply Comments are due not later than 14 days after the date on which Initial Comments are to be submitted.

Very truly yours,

A handwritten signature in black ink, appearing to read "I. D. Volner", with a horizontal line underneath.

IDV:sch

Ian D. Volner
Rita L. Brickman

cc: Steven Sharfman, Esq.