

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

Notice of Price Adjustment

Docket No. R2010-3

MOTION OF THE
PUBLIC REPRESENTATIVE
TO DEFER DEADLINES
(March 3, 2010)

The Public Representative hereby requests the Commission to postpone the deadline for comments established in Order No. 416. The Postal Service has asserted a broad range of potential net financial impacts as a result of this new summer sale. Notice pages 6-8 section D states “The Postal Service expects the sale to generate between 311 million and 1.1 billion incremental Standard Mail pieces” which will generate “an incremental revenue increase of about \$34 to \$157 million from this new volume” and an “expected net effect of the program is a net contribution change of -\$3.5 million to +\$25.4 million.” These representations do not meet the requirements of Order No. 219.

When the Commission approved last year’s summer sale, it noted several deficiencies in the Postal Service’s notice of price adjustment. The Commission described how it had had to seek essential information that was not included in the initial filing. The Commission stated,¹

CHIR No. 1 was designed to clarify the Postal Service’s proposal. The responses substantially expand on the Postal Service initial filing and provide essential details regarding the scope of the program and its underlying basis. CHIR No. 1 sought information on metrics to measure the success of the Summer Sale program, including complete cost analyses and volume migration from other classes or time periods, the definition of short-run excess capacity, eligibility for the program,

¹ Docket No. R2009-3, Order No 219, June 4, 2009, at 3 (emphasis added; citation omitted).

contribution level for Standard Mail flats, and documentation of cost and revenue estimates. . . . *The Commission expects the Postal Service to provide this level of detail in future initial filings.*

For interested parties, the initial comment period is 20 days. In practical terms, this means that when the Postal Service does not provide necessary data, commenters can only bemoan the lack of information rather than perform analysis. When approving last year's fall sale, the Commission encountered similar problems. It stated,²

[T]he Commission finds it necessary to underscore that future pricing adjustment filings *must be fully supported and documented* to enable the Commission to adequately assess their merits in timely fashion. Otherwise, the Commission will be obliged to defer action on such proposals pending the development of a more complete record.

The Postal Service has not "fully supported and documented" its filing. Information requests will need to be submitted to the Postal Service. The Public Representative requests that the questions in Appendix A be forwarded to the Postal Service. The Public Representative also requests that commenters have 20 days from the last response to information requests to file comments.

Respectfully submitted,

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² Docket No R2009-5, Order No 299, September 16, 2009, at 18 (emphasis added).

Appendix A
Public Representatives Proposed Questions.

1. Using the data compiled from the R2009-3 Summer Sale:
 - a. Please fill in the following chart for the period covered by the last summer sale

July 09- September 09 Volume compared to July 08- September 08 Volume Trend	# of mailers	% of volume
<-15%		
0 to -15%		
0% to 5%		
5% to 15 %		
over 15%		

- b. Please fill in the following chart for the past two fiscal years

July 08- September 09 Volume compared to July 07- September 08 Volume Trend	# of mailers	% of volume
<-15%		
0 to -15%		
0% to 5%		
5% to 15 %		
over 15%		

2. How much would the administrative cost increase by lowering the threshold for eligibility for the following volumes:
 - a.) 300k
 - b.) 200k
 - c.) 100k
3. How will this agreement affect mailers not party to the agreement?
4. Will there be a registration adjustment to the threshold volumes, similar to R2009-3 adjustment? If so, please explain how this will be calculated.
5. Are volume increases which could occur due to large mailers attracting mail volumes from smaller, non- eligible mailers, treated as 'incremental volumes', thus eligible for the incentive rates?