

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON DC 20268-0001**

**Rate Adjustment Due to Extraordinary
Or Exceptional Circumstances**

Docket No. R2010-4

**MOTION OF THE PARCEL SHIPPERS ASSOCIATION
TO FILE FURTHER COMMENTS (OUT OF TIME)
(September 10, 2010)**

The Parcel Shippers Association (PSA) hereby moves to file further comments, out of time, in the above-captioned proceeding. The attached brief comments are necessitated by the Postal Service filing late on September 8, 2010 *further* errata to the data it relies upon to justify the unreasonable, inequitable, and unnecessary price increases it proposes to visit on mailers of Standard Mail NFMs/Parcels. See PSA Comments at 2. These latest corrections come six days after the date for filing reply comments established by the Postal Regulatory Commission. See Order No. 485 at 6. They purport to correct errors PSA Reply Comments pointed out in a Postal Service “errata” that itself was intended to correct errors PSA had pointed out previously in its initial Comments. See PSA Comments, fn. 12; PSA Reply Comments at 4.

This latest adventure in revisionism further demonstrates what PSA said in its Reply Comments.¹

In its further errata, the Postal Service replaces “what were thought to be” correct prices in its previous revenue calculations (as corrected by its previous errata) with prices that the Postal Service now thinks are correct. Even in the quite unlikely case

¹ PSA noted in its comments the “data and methodology underlying the proposed [Standard Mail NFMs/Parcels] increases inspire no confidence the proposed prices will achieve the stated goals.” See PSA Comments, Section III.d. This recent Postal Service reestimation, filed less than a week before the deadline for filing reply comments, is further testament that one cannot rely on the Postal Service to determine what price increase would ensure that Standard Parcel NFMs/Parcels will cover their cost, even if one thought that was a desirable outcome at this time. PSA Reply Comments at 3.

that the Postal Service has *finally* gotten its revenue-per-piece calculations correct,² the further errata makes no attempt at all to correct its substantially-overstated FY 2011 cost estimates. Thus, the Postal Service's newly-estimated financials would still continue to substantially understate – likely by 20 percent or more – the FY 2011 cost coverage for Standard Mail NFMs/Parcels.

As does the Commission, we want to have a correct record so it is hard to chastise the Postal Service for its fumbling efforts to get it right. On the other hand, these efforts hardly inspire confidence that any of the Postal Service's numbers on Standard Mail NFMs/Parcels are correct, as we pointed out in our Comments and Reply Comments, and as, regrettably, we must request leave to do yet again.

Respectfully submitted,

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September 10, 2010

² Just as with its previous errata (filed August 27, 2010), a full review of this one is not possible because the accompanying spreadsheets are not fully linked.