Postal Regulatory Commission
Submitted 10/18/2010 3:15:50 PM
Filing ID: 70530
Accepted 10/18/2010

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

Consideration of Technical Methods to Be Applied in Workshare Discount Design	Docket No. RM2010-13

MOTION FOR EXTENSION OF TIME
(October 18, 2010)

The National Postal Policy Council, the National Association of Presort Mailers, the American Bankers Association, the Major Mailers Association, the Financial Services Roundtable, Discover Financial Services, and Bank of America Corporation (the "Parties") hereby respectfully move for an extension of the due date for comments in this proceeding for two months, until January 14, 2011.

The Parties are mailers and/or providers of mailing services for bulk commercial First-Class Mail and accordingly have a direct interest in this proceeding insofar as it concerns worksharing discounts in First-Class Mail. In Order No. 537, the Commission established this proceeding to "consider analyses, arguments, and proposals concerning technical issues that relate to the design of workshare discounts" and set a comment deadline of November 15, 2010.

The undersigned parties appreciate the importance of this proceeding, as it will establish the basic framework for worksharing discounts in First-Class Mail going forward. We are currently in the process of developing appropriate responses to Order No. 537 that will assist the Commission in setting guidance for worksharing

discounts in First-Class Mail. In doing so, the parties believe an extension of time is appropriate.[1]

First, while we appreciate that the Commission may have intended to provide sufficient time for the preparation of responses, it appears that the November 15 date simply does not allow sufficient time to prepare suitable analyses. The issues raised by Order No. 537 are broad and complex, and require serious attention.

Second, the postal volume, revenue, and cost data that would provide the underpinning for appropriate worksharing discounts would, if the November date holds, be based on FY2009 costs. The Postal Service is due to file its next Annual Compliance Review by the end of December of this year, covering FY2010. That more recent data would provide a more appropriate set of data for the Commission's consideration. The proposed filing date would allow parties approximately two weeks to incorporate the most current data into their analyses.

Accordingly, the undersigned parties respectfully move for an extension of the comment period until January 14, 2011.

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[1] On October 13, 2010, the Postal Service filed in the United States Court of Appeals for the District of Columbia Circuit a petition for review of Order No. 536. The Postal Service has not identified the issues that it will raise on review, and therefore it is premature to assess the impact of that petition on this proceeding.

Respectfully submitted,

NATIONAL POSTAL POLICY COUNCIL

By: /s/ William B. Baker_____
William B. Baker
WILEY REIN LLP
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 719-7255

Mury L. Salls
DST Mailing Services
1100 Investment Blvd
El Dorado Hills, CA 95762

PRESIDENT, MAJOR MAILERS ASSOCIATION

Joel T. Thomas
Executive Director
NATIONAL ASSOCIATION OF PRESORT MAILERS
1105 Mace Road
Annapolis, MD 21403
(877) 620-6276
joel@presortmailer.org

Vincent Barnes
Senior Counsel
AMERICAN BANKERS ASSOCIATION
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 663-5230
vbarnes@aba.com

Robert J. Brinkmann
Law Offices of Robert J. Brinkmann LLC
1730 M St. N.W. Suite 200
Washington, DC 20036
202.331.3037; 202.331-3029 (f)
Robert.brinkmann@rjbrinkmann.com

COUNSEL FOR DISCOVER FINANCIAL SERVICES

Michael F Scanlon
K&L Gates LLP
1601 K Street, NW
Washington, DC 20006
Tel: (202) 778-9000
Fax: (202) 778-9100
michael.scanlon@klgates.com

COUNSEL FOR BANK OF AMERICA CORPORATION

Certificate of Service

I hereby certify that I have this 18th day of October, 2010, caused to be served the foregoing document upon the United States Postal Service and the Office of the Consumer Advocate in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker____
William B. Baker