

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

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO MOTION FOR EXTENSION OF TIME
(October 21, 2010)

On September 14, 2010, the Commission issued Order No. 537, establishing the above-captioned docket to consider technical issues left unresolved in Docket No. RM2009-3. That Order called for the submission of initial comments by November 15, 2010. On October 7, 2010, the Chairman issued Chairman's Information Request No. 1, seeking the provision of certain specific additional information from the Postal Service on November 1, 2010. On October 18, several parties (NPPC, NAPM, ABA, MMA, Financial Services Roundtable, Discover, and BOA) filed a motion to extend the due date for comments to January 14, 2011. The Postal Service hereby responds.

The parties provide two grounds to support their motion. First, they note the importance and the complexity of the subject matter, and what they consider to be a potentially inadequate time to prepare satisfactory responsive analysis. Second, they note that any analysis done by the original due date will necessarily be limited to data from FY09, when corresponding updated data from FY10 will be available at the end of December. They submit that the FY10 data would provide a more appropriate set of data for consideration by the Commission.

The Postal Service sees substantial merit in the grounds advanced to support the motion for extension. The Postal Service is compelled to note, however, that if the set of data to be considered should consist of FY10 data, then it makes little sense for the Postal Service to be burdened to prepare and submit an analysis responsive to ChIR No. 1 on November 1st using FY09 data. Therefore, the Postal Service seeks somewhat different relief from that requested by the parties.

The Postal Service alternatively requests that the date for a reply to ChIR No. 1 be pushed back from November 1 to sometime after the issuance of the ACR. Given other obligations likely to be imposed on the Postal Service's technical staff during the pendency of the ACR proceeding, a date no earlier than mid-to-late January would seem to be in order. Since the Commission initially created a 15-day gap between the response date to ChIR No. 1 and submission of initial comments by the parties, a commensurate 15-day gap would seem suitable, although a slightly longer gap might perhaps be reasonable as well. Either way, this would presumably push the due date for initial comments by all of the parties (including the Postal Service) to sometime in February.

Therefore, to the extent discussed above, the Postal Service supports the parties' motion for extension of time to file initial comments, but seeks a slightly different schedule, and most immediately seeks relief from the obligation to respond to ChIR No. 1 by November 1. If the date for party comments were extended to January, but the response to ChIR No. 1 were left at November 1, the Postal Service in all likelihood would subsequently be required to replicate

the ChIR No. 1 analysis using FY10 data. Such a result would appear to be unwarranted, and the Postal Service respectfully urges the Commission to make adjustments to avoid it, if the Commission is inclined to grant the parties' motion.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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October 21, 2010