

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Before Commissioners:

Ruth Y. Goldway, Chairman;  
Tony L. Hammond, Vice Chairman;  
Mark Acton;  
Dan G. Blair; and  
Nanci E. Langley

Consideration of Technical Methods to Be  
Applied in Workshare Discount Design

Docket No. RM2010-13

ORDER GRANTING MOTION FOR EXTENSION OF TIME

(Issued October 25, 2010)

Order No. 537 initiated this docket to consider technically-oriented analyses, arguments, and proposals relating to the design of workshare discounts. It established November 15, 2010, as the date on which comments were due.<sup>1</sup> Chairman's Information Request No. 1 (CHIR No. 1), issued on October 7, 2010, asked the Postal Service to provide an analysis of the avoidable costs of a list of candidate benchmarks for presorted First-Class Mail.

On October 18, 2010, a group of mailers of presort First-Class Mail filed a motion to extend the due date for initial comments from November 15, 2010 to January 14,

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<sup>1</sup> Notice of Proposed Rulemaking Concerning the Technical Methods to be Applied in Designing Workshare Discounts, September 14, 2010.

2011.<sup>2</sup> The Motion noted that the subject matter of this docket is important and complex, since it will establish the basic framework for worksharing discounts relating to First-Class Mail. It argues that the original comment period is too short to allow the participants to prepare appropriate responses. In addition, the Motion observes, FY 2010 volume, revenue, and cost data will be available by the end of calendar 2010. It argues that extending the comment period by approximately 60 days would allow participants two weeks to incorporate FY 2010 data in their comments.

The Postal Service responds that the Motion offers legitimate grounds for an extension of the comment period.<sup>3</sup> It observes, however, that while the Annual Compliance Review is pending, there will be considerable demands on the time of the Postal Service's technical staff. Given those demands, it asserts that if FY 2010 data is to provide the basis of the cost analysis for First-Class Mail benchmark candidates, as called for by CHIR No. 1, this could not be done unless the current due date of November 1, 2010, is extended to mid-to-late January, 2011. The Postal Service notes that this would require that comments be due sometime in February if they are to be filed at least 15 days after its analysis of benchmark costs becomes available.

The Greeting Card Association responded to the Motion as well.<sup>4</sup> It does not object to the Motion, but asks that the Commission assume that there will be a need for reply comments, and that it set the date for reply comments at the same time that it rules on the Motion. It proposes that reply comments be due March 1, 2011, which is approximately six weeks after the January 14, 2011 due date for comments proposed in the Motion.

The considerations offered in the Motion and the responses to it are well taken. They are sufficient to warrant a substantial extension of the comment period.

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<sup>2</sup> Motion for Extension of Time, October 18, 2010. The motion was signed by representatives for the American Bankers Association, Bank of America Corporation, Discover Financial Services, Major Mailers Association, National Association of Presort Mailers, and National Postal Policy Council (Motion).

<sup>3</sup> Response of the United States Postal Service to Motion for Extension of Time, October 21, 2010.

<sup>4</sup> Response of the Greeting Card Association to Motion for Extension of Time, October 22, 2010.

Accordingly, the motion is granted. Because the Postal Service's technical staff will need additional time to analyze FY 2010 data and incorporate that information into its response to CHIR No. 1, the due date for its response to CHIR No. 1 is revised to January 18, 2011. The due dates for initial and reply comments from interested persons are extended to February 18, 2011 and April 4, 2011, respectively.

*It is ordered:*

1. The Motion for Extension of Time, filed October 18, 2010, in this docket is granted.
2. The Postal Service's response to Chairman's Information Request No. 1 is due January 18, 2011.
3. The due date for initial comments is extended to February 18, 2011.
4. Reply comments are due April 4, 2011.

By the Commission.

Shoshana M. Grove  
Secretary