

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

NOTICE OF RULEMAKING

Docket No. RM2010-9

RESPONSE OF THE UNITED STATES POSTAL SERVICE IN OPPOSITION
TO THE PUBLIC REPRESENTATIVE'S MOTION FOR ISSUANCE OF INFORMATION
REQUEST
(October 27, 2010)

On October 20, the Public Representative filed a motion for the issuance of an information request in this docket. The Public Representative seeks information on data collection and reporting from the First-Class Mail Incentive program, above that requested in Chairman's Information Request No. 1 ("CHIR No. 1"). The Postal Service objects to this motion.

As the Postal Service understands it, the goal of this docket is to evaluate the various approaches used to estimate volume changes resulting from incentive programs and to try to establish an appropriate methodology for the future. The Postal Service responded to CHIR No. 1, and further informal requests from both Commission staff and the Public Representative, in the hope that it would help in developing constructive proposals for an evaluative methodology. The questions proposed by the Public Representative, however, are focused on an audit of past data, not on how to evaluate those data. The Postal Service does not believe that a further, perhaps prolonged, discussion of these issues will illuminate the issues surrounding the development of a conceptual framework for analyzing incentive programs.

Accordingly, the Postal Service respectfully requests that the Commission deny the Public Representative's Motion.

UNITED STATES POSTAL SERVICE

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