

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

Annual Compliance Report, 2011

Docket No. ACR2011

**PITNEY BOWES INC. MOTION
FOR ISSUANCE OF INFORMATION REQUEST
(February 24, 2012)**

Pursuant to section 21(a) of the Commission's Rules of Practice and Procedure, 39 C.F.R. § 3001.21(a), Pitney Bowes Inc. (Pitney Bowes) hereby moves the Commission to issue a Commission Information Request (CIR), seeking information necessary to fully understand the data on "costs, revenues, rates, and quality of service" filed in the Postal Service's Annual Compliance Report (ACR). Specifically, Pitney Bowes respectfully requests that the Commission issue a CIR directing the Postal Service to provide answers to the Commission and the public to the following questions:

1. Please refer to pages 5-6 of the Postal Service reply comments where you discuss the relationship between excess capacity and worksharing discounts and state "[g]iven the present uncertainty as to whether and to what extent the Postal Service will be able to institute those changes, and given the general difficulty in removing excess capacity quickly enough to match changes in mail volume, the Postal Service believes that deliberately keeping select passthroughs below 100 percent for the time being will improve the efficiency of the Postal Service."

- a. Please identify the “select” workshare discounts for which the Postal Service believes passthroughs should be deliberately kept below 100 percent for the time being to “improve the efficiency of the Postal Service.”
- b. Please identify with specificity the criteria (e.g., a volume threshold of one billion pieces) used and how they were used to determine which workshare discounts should have passthroughs deliberately kept below 100 percent for the time being to “improve the efficiency of the Postal Service.”
- c. Please define “excess capacity” and “efficiency” as used in the quoted sentence.
- d. Please explain in detail how deliberately keeping select passthrough below 100 percent will “improve the efficiency of the Postal Service.” If possible, please quantify the efficiency improvement and provide all underlying calculations in an electronic spreadsheet format.
- e. Does the Postal Service believe that deliberately keeping select passthroughs below 100 percent will result in a reduction in mailer worksharing? Please explain your response fully.
- f. Is reducing the amount of mailer worksharing the primary purpose of deliberately keeping select passthroughs below 100 percent? If not, is reducing the amount of mailer worksharing a purpose of deliberately keeping select passthroughs below 100 percent? Please explain your response fully.
- g. For each discount identified in subpart (a), please quantify the volume of mail, if any, that the Postal Service expects will revert to a less-workshared rate category because the passthrough is deliberately kept below 100 percent (relative to setting the

passthrough at 100 percent). Please provide all underlying calculations for these estimates.

Respectfully submitted:

/s/

James Pierce Myers
Attorney at Law
1420 King Street
Suite 620
Alexandria, Virginia 22306
Telephone: (571) 257-7622
E-Mail: jpm@piercemyers.com

Michael F. Scanlon
K&L GATES LLP
1601 K Street, NW
Washington, DC 20006
Telephone: (202) 778-9000
E-Mail: michael.scanlon@klgates.com

Counsel to PITNEY BOWES INC.