

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

COMPETITIVE PRODUCT PRICES
EXPRESS MAIL & PRIORITY MAIL
EXPRESS MAIL & PRIORITY MAIL CONTRACT 5

Docket No. MC2009-18

COMPETITIVE PRODUCT PRICES
EXPRESS MAIL & PRIORITY MAIL CONTRACT 5
(MC2009-17)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2009-25

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(April 6, 2012)

In Order No. 1281, issued March 9, 2012, the Commission granted the Postal Service's request for a temporary extension of the contract in the instant docket, until April 11, 2012, or until such time as a successor contract had been approved. The Postal Service and the customer have been working diligently to reach a new agreement to avoid any interruption in the Postal Service's ability to provide this customer access to negotiated rates. However, the customer has recently experienced a change in personnel in the position with the primary responsibility for approving a successor contract. While the Postal Service and the customer had agreed in principle on a new contract, this change in personnel will delay the customer's final review and approval of the contract, until the new individual in this position is able to adequately review the terms of the agreement.

The Postal Service expects the successor contract will be signed by the customer in the near future, so that it may then be filed with the Commission. However, there is some uncertainty as to how long the review process will take as the new personnel gets up to speed on this agreement and the myriad other responsibilities of the new position. Because of this unexpected delay and the timing of the regulatory process, the customer now faces the prospect of an interruption in its access to negotiated rates as a result of the processes that it must participate in when it does business with the Postal Service, rather than with one of the Postal Service's competitors.

To avoid this result, the Postal Service respectfully requests that the Commission grant an additional sixty-day extension to allow the existing contract to remain in effect. By that time, the Postal Service expects that the customer will have completed its review of the successor contract, gathered the appropriate signature(s), and returned the signed contract to the Postal Service for filing with the Commission. The Commission would then be able to complete its regulatory review of the new contract within this sixty-day window. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list until the effective date for the new contract is established.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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