

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

RATE ADJUSTMENT DUE TO)
EXTRAORDINARY OR EXCEPTIONAL) Docket No. R2013-11
CIRCUMSTANCES)

**MOTION OF
MPA—THE ASSOCIATION OF MAGAZINE MEDIA,
ASSOCIATION FOR POSTAL COMMERCE,
THE AMERICAN CATALOG MAILERS ASSOCIATION, INC.,
DIRECT MARKETING ASSOCIATION, INC.,
ALLIANCE OF NONPROFIT MAILERS,
ASSOCIATION OF MARKETING SERVICE PROVIDERS,
MAJOR MAILERS ASSOCIATION,
NATIONAL NEWSPAPER ASSOCIATION,
PRINTING INDUSTRIES OF AMERICA,
QUAD/GRAPHICS, INC., R.R. DONNELLEY,
SOFTWARE & INFORMATION INDUSTRY ASSOCIATION/
AMERICAN BUSINESS MEDIA, AND TIME INC.
FOR ISSUANCE OF FIFTH INFORMATION REQUEST
(November 15, 2013)**

Pursuant to 39 C.F.R. § 3001.21(a), the undersigned parties respectfully request that the Presiding Officer issue an Information Request to obtain answers to the questions stated in this motion. Each question is followed by an explanation of its importance.

26. Please produce a corrected version of POIR.6.Q.14.ExigentImpact.xlsx, including the "CRA Level" tab.

Explanation: In response to POIR No. 6, Question 14, the Postal Service filed POIR.6.Q.14.ExigentImpact.xlsx, an updated version of USPS-R2010-4R/10,

ExigentImpact.xlsx, that includes FY 2013 and FY 2014 Before-Rates volume projections. The "CRA Level" tab is in error. Specifically, the FY 2013 and FY 2014 product-level volume changes on this tab do not sum to the class-level volume changes. For the sake of a complete and accurate record, the Postal Service should provide a corrected spreadsheet.

27. Please provide a responsive answer to POIR No. 6, Question 2(c).

Explanation: POIR No. 6, Question 2(c) asked the Postal Service to update its case to reflect competitive product price increases filed by the Postal Service during the pendency of this case. The Postal Service, in its November 13 response to Question 2(c), declined to answer the question, stating only: "The price increase for competitive products is not final until filed. Filing is currently scheduled for November 13, 2013."

The Postal Service in fact filed its "price increase for competitive products" on November 13, the same day as the POIR response. The case has been docketed in Docket No. CP2014-5, *Competitive Products Price Changes—Rate of General Applicability* (USPS notice of rate changes filed November 13, 2013). Accordingly, the Commission should direct the Postal Service to provide a responsive answer to POIR No. 6, Question 2(c).

CONCLUSION

Wherefore, the undersigned parties respectfully request that the Presiding Officer issue an Information Request to obtain answers to the questions stated in this motion.

Respectfully submitted,

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