

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

Periodic Reporting
(Alternate Format CRA Report)

Docket No. RM2014-2

PUBLIC REPRESENTATIVE COMMENTS IN RESPONSE
TO ORDER NO. 1891, CONCERNING RULEMAKING TO ELIMINATE THE
ALTERNATE FORMAT CRA REPORT

December 3, 2013

I. INTRODUCTION

The Public Representative files Comments pursuant to the Commission's Notice of November 21, 2013, regarding the Postal Service's petition to eliminate the requirement that it file the Alternate Format CRA Report as part of its periodic reporting.¹

On November 15, 2013, the Postal Service filed a petition pursuant to 39 CFR 3050.14, requesting the Commission initiate a rulemaking proceeding to eliminate the requirement for the filing of the Alternate CRA.² In addition, the Petition requests a waiver from the annual filing requirement for FY 2013.³

II. COMMENTS

As noted by the Postal Service in its filing, the Alternate Format CRA served as a bridge between pre-PAEA and PAEA specified product classifications. *Petition at 4.* It

¹ Notice of Petition for the Initiation of a Proceeding to Eliminate the Alternative Format CRA Report, November 21, 2013, Order No. 1891 (Notice).

² Petition of the United States Postal Service for the Initiation of a Proceeding to Eliminate the Requirement for an Alternative Format CRA Report, November 15, 2013 (Petition).

³ *Id.* at 1

was a useful check during the transition to ensure that all pre-PAEA products were included within the PAEA product classifications. Additionally, the data from the report was used to calculate and maintain historical trends in costs at the product level.

Given the significance of the report in prior years and the insufficient span of time in which to receive input from interested parties regarding the benefits and uses of this data point, the Public Representative recommends the denial of the Postal Service's request for a waiver to file the Alternate CRA for FY 2013, while deliberations weighing the merits of its continued existence have not been completed.

III. CONCLUSION

The Public Representative respectfully submits the foregoing Comments for the Commission's consideration.

Respectfully submitted,

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