

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Eleven)

Docket No. RM2015-4

PUBLIC REPRESENTATIVE MOTION TO EXTEND COMMENT DEADLINES

(November 21, 2014)

Pursuant to 39 C.F.R. §§ 3001.16 and 21, the Public Representative hereby moves to extend the deadlines for submitting initial and reply comments in this proceeding.

I. BACKGROUND

On November 4, 2014, the Postal Service filed a request, pursuant to 39 C.F.R. § 3050.11, that the Commission initiate a rulemaking proceeding to consider a proposal to change analytical principles relating to the Postal Service's periodic reports.¹ Specifically, it proposes to change the distribution key for assigning the costs of debit and credit card fees to products. Petition at 1.

On November 7, 2014, the Commission issued a notice and order initiating this proceeding, appointing the undersigned Public Representative, and establishing November 25, 2014 and December 11, 2014 as the deadlines for submitting initial and reply comments, respectively.² Chairman's Information Request No. 1 was issued on November 20, 2014, with the Postal Service's responses due no later than November 26, 2014.³

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Eleven), November 4, 2014 (Petition); see Notice of Filing of USPS-RM2015-4/NP1 and Application for Nonpublic Treatment, November 4, 2014.

² Order No. 2244, Notice and Order of Proposed Rulemaking on Analytical Principles Used in Periodic Reporting (Proposal Eleven), November 7, 2014, at 3.

³ Chairman's Information Request No. 1, November 20, 2014 (CHIR No. 1).

II. ARGUMENT

The Public Representative seeks to extend the deadline for filing initial and reply comments to allow interested persons sufficient time to consider the Postal Service's responses to CHIR No. 1. Without the clarifications provided by the Postal Service in its responses, interested persons, including the Public Representative, cannot develop complete comments in this proceeding.

The Commission routinely extends comment deadlines to allow interested persons time to prepare comments that consider responses to information requests.⁴ In addition, the Postal Service also recognizes that interested persons may require additional time to prepare comments when responses to an information request are "extensive."⁵

III. SPECIFIC RELIEF REQUESTED

The Public Representative respectfully requests that the Commission extend the comment deadlines to December 3, 2014 for initial comments and December 17, 2014 for reply comments.

If the Postal Service does not file complete responses to CHIR No. 1 by November 26, 2014, the Public Representative respectfully requests that the Commission extend the initial comment deadline to 3 business days after the Postal Service submits complete responses to CHIR No. 1. The reply comment deadline should be extended to 14 days after the revised initial comment deadline.⁶

⁴ See, e.g., Docket No. RM2015-2, Order No. 2253, Order Extending Deadline for Comments, November 19, 2014; Docket Nos. MC2014-21 and R2014-6, Order No. 2049, Order Extending Comment Deadlines, April 14, 2014.

⁵ Docket No. R2013-6, Response to Order Extending Deadline for Comments, May 2, 2013, at 1.

⁶ For example, if the Postal Service files complete responses to CHIR No. 1 on December 1, 2014, the revised initial comment deadline would be on December 4, 2014. The revised reply comment deadline would be on December 18, 2014.

Respectfully submitted,

/s/ Curtis Kidd

Curtis Kidd

Public Representative for Docket No. RM2015-4

901 New York Avenue, N.W., Suite 200

Washington, D.C. 20268-0001

(202) 789-6881; Fax (202) 789-6861

E-mail: curtis.kidd@prc.gov