

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

REMOVAL OF RETURN RECEIPT FOR  
MERCHANDISE SERVICE FROM THE MAIL  
CLASSIFICATION SCHEDULE

Docket No. MC2015-8

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
IN PARTIAL OPPOSITION TO THE PUBLIC REPRESENTATIVE'S MOTION  
FOR THE EXTENSION OF COMMENT DEADLINE**  
(December 2, 2014)

The United States Postal Service ("Postal Service") hereby provides its response in partial opposition to the motion of the Public Representative ("PR") to extend the comment deadline in this Docket ("Motion").<sup>1</sup> In particular, the Motion requests that the comment deadline be extended by four (4) business days, from December 3, 2014 to December 9, 2014.<sup>2</sup> In support of its request, the PR simply states that the extension is required because the Postal Service's request "appears to implicate several complex issues that require additional analysis..."<sup>3</sup> The PR offers no other explanation for why the original comment deadline, which provided interested parties with nine (9) business days to submit comments, is insufficient.

The Postal Service is concerned by the lateness of the PR's motion, and its lack of particularity. In this regard, it is worth noting that 39 U.S.C. § 3001.21 requires that motions "set forth with particularity" the "grounds and basis" for the relief sought. The need for such particularity is enhanced in this case by: 1) the

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<sup>1</sup> Docket No. MC2015-8, Public Representative Motion for extension of Comment Deadline, at 1 (December 2, 2014).

<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

fact that the PR's motion was filed only one day before the original comment deadline, leaving interested parties with little time to assess the merits of the PR's arguments or respond; and 2) the fact that the Postal Service has requested that the Commission expedite the review of its request in this Docket.<sup>4</sup> In light of the above, the Postal Service does not believe that the explanation offered by the PR in the instant motion meets the requirements of rule 3001.21, let alone warrant such a substantial extension of the comment deadline. Accordingly, the Postal Service requests that the Commission deny the PR's motion.

Nevertheless, in light of last week's holiday, and in the interest of providing all parties with adequate time to file comments, the Postal Service will support a modest extension of the comment deadline to December 5, 2014.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
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<sup>4</sup> See Docket No. MC2015-8, Request of the United States Postal Service to Remove Return Receipt for Merchandise Service from the Mail Classification Schedule, at 2 (November 17, 2014).