

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

PERIODIC REPORTING
(PROPOSAL THIRTEEN)

Docket No. RM2015-7

**REQUEST OF THE UNITED STATES POSTAL SERVICE FOR
EXTENSION OF TIME TO RESPOND TO UPS MOTION
REGARDING ISSUANCE OF AN INFORMATION REQUEST**
(March 23, 2015)

On March 18, 2015, UPS filed its Initial Comments in this proceeding, accompanied by a motion seeking the issuance of an Information Request. The information sought by UPS in its motion would, under protective conditions, allow the data for each individual carrier route in the nationwide Form 3999 database to be matched to the actual ZIP Code in which that route operates. Under normal Rule 21 procedures, the Postal Service's answer to the UPS motion for issuance of an Information Request would be due no later than Wednesday, March 25. For the reasons explained below, the Postal Service seeks a three business-day extension of that deadline to Monday, March 30. The Postal Service has consulted UPS counsel, and been informed that UPS does not oppose this request.

UPS explicitly links its request for additional data to the analysis already conducted by UPS and presented as part of its March 18th Comments submission. UPS Motion at 2-3. UPS views access to the requested data as useful to the further evaluation of the model it has submitted, and the alternative approach underlying that model. *Id.* In a very real sense, therefore, reasonable consideration of the motion requires at least some opportunity to review the fundamental plausibility of the alternative approach now advanced by UPS. For example, a preliminary read of the

UPS comments indicates that UPS may not have made any use of the Form 3999 data for the 300 ZIP Codes to which UPS has already gotten crosswalk access. Further analysis of issues like this is important if the Postal Service is to provide a reasoned and useful response to the motion. Unfortunately, as previously noted in the Postal Service's March 10th response to the Public Representative's request to postpone initial comments, the Postal Service's lead expert was out of the country last week when the UPS materials were submitted. His absence last week substantially impaired the Postal Service's ability to prepare a thorough response to the UPS motion by Wednesday, March 25. Compounding this difficulty is the Chairman's issuance on last Friday (March 20) of a six-page Information Request seeking a variety of additional information and new analyses. Responses to that request (ChIR No. 3) are sought by this coming Friday (March 27) and, of course, preparing those responses will absorb the same resources as those also necessary to prepare an adequate response to the motion.

Under the circumstances, the Postal Service views a short extension of time to respond to the UPS motion as more than warranted. Accordingly, the Postal Service respectfully requests that the deadline for its answer to the March 18th UPS motion for issuance of an Information Request be extended to Monday, March 30, 2015.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 277-6333
March 23, 2015