

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

SERVICE PERFORMANCE MEASUREMENT
SYSTEMS FOR MARKET DOMINANT PRODUCTS

Docket No. PI2015-1

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR EXTENSION OF TIME TO FILE REPLY COMMENTS**

(April 21, 2015)

The United States Postal Service hereby moves that the Postal Regulatory Commission change the deadline for the filing of reply comments in this docket from April 22 to May 5, 2015, for the reasons stated below.

In response to PRC Order No. 2385 (March 9, 2015), interested parties submitted comments to the Commission either on or before April 8, 2015, regarding the Postal Service proposal to change certain methods of market-dominant product service performance measurement data collection from external to internal, within the meaning of 39 U.S.C. § 3691(b). That Order established April 22, 2015 as the deadline for submission of reply comments by the Postal Service.

The parties' comments address a wide variety of important substantive issues. The Postal Service intends for its reply comments to benefit from thoughtful and robust internal discussions among representatives from various postal headquarters departments and at different levels of management. On many issues, those deliberations have been ongoing since shortly after the parties' comments were filed.

As of today, internal consultations continue on a number of substantive technical, policy and legal issues. The unresolved status of some issues impacts the ability of the Postal to submit a comprehensive set of reply comments in the short-term. However, the Postal Service expects to conclude all necessary deliberations during the latter part of next week (April 27 - May 1), which will allow for the submission of a comprehensive set of reply comments a few workdays later -- on May 5, 2015. The Postal Service does not consider that any party will be prejudiced by the granting of this request.

Accordingly, the Postal Service respectfully requests that this motion be granted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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