

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 SECOND EXTENSION OF TIME TO FILE REPLY COMMENTS**  
(May 4, 2015)

The United States Postal Service hereby moves that the Postal Regulatory Commission extend the deadline for the filing of reply comments in this docket from May 5 to May 18, 2015, for the reasons stated below.

In response to 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). Order No. 2385 established April 22, 2015 as the deadline for submission of reply comments by the Postal Service. In response to a request from the Postal Service on April 21, 2015, the Commission issued Order No. 2448 that same day, which extended the deadline for submission of reply comments from April 22 to May 5, 2015.

In its April 21, 2015 motion for extension, the Postal Service explained that continuing internal consultations on a number of substantive technical, policy and legal issues required additional time before it could submit reply comments. Postal Service personnel responsible for developing responses to the parties' comments have worked

diligently to solicit the views of subject matter experts throughout headquarters. The parties' comments address a wide variety of important substantive issues and have required more extensive consultations than were earlier assumed would be necessary. These internal consultations continue to-date and 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 now expects to conclude all necessary deliberations during the latter part of next week (May 11 to May 15), which will allow for the submission of a comprehensive set of reply comments on or before May 18, 2015. Consequently, the Postal Service requests that the current deadline be extended to that date.

The Postal Service does not consider that any party will be prejudiced by the Commission's approval of this request. Accordingly, the Postal Service respectfully requests that this motion be granted.

Respectfully submitted,

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