

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

YANTIC POST OFFICE
YANTIC, CONNECTICUT 06389

Docket No. A2015-1

UNITED STATES POSTAL SERVICE
MOTION FOR LEAVE TO FILE A REPLY
(May 15, 2015)

The United States Postal Service respectfully asks for leave to file a brief response to Reply Comments filed by the Public Representative.¹ These comments raise significant new issues that were not contemplated in Order No. 2392 or in any prior submission in this proceeding. The Postal Service believes that it is necessary to lodge at least a brief response to the Public Representative's comments. Moreover, without an opportunity to respond, the Postal Service will be prejudiced by the Public Representative's decision to forego raising these issues until after the Postal Service submitted its Answer. The Postal Service observes that the Postal Regulatory Commission's (Commission's) rules of practice and procedure applicable to Post Office Closing appeals typically provide the Postal Service fourteen days to address issues raised in a party's initial submission in a Post Office closing appeal docket.² The Postal Service does not believe that any party will be prejudiced by this action.

¹ Reply Comments of the Public Representative, PRC Docket No. A2015-1 (May 12, 2015).

² 39 C.F.R. § 3025.42.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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