

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

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL CONTRACT 40 (MC2012-38)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2012-46

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(October 8, 2015)

In Order No. 2660, issued August 12, 2015, the Commission granted, in part, the Postal Service's request for a temporary extension of the contract in the instant docket, until October 15, 2015. The Postal Service and the customer have been working diligently to reach a new agreement, which would avoid any interruption in the Postal Service's ability to provide this customer access to negotiated rates. However, the Postal Service and the customer were unable to reach an agreement in time to file it with the Commission more than 15 days prior to the October 15 expiration date.

Nevertheless, the Postal Service can report that it has received the necessary data from the customer that necessitated the Postal Service's initial motion for relief in this docket. The Postal Service has presented the customer with the updated pricing proposal based on that data, and expects to reach an agreement within the next two weeks. Once the new contract has been signed, the Postal Service intends to immediately file the new contract with the Commission to avoid the need for any additional extensions of the existing contract. Yet because of the timing of the regulatory process, there may be a window between the expiration of the existing contract in this docket and the effective date of the successor contract, while the

Commission completes its review. Thus, the customer continues to face the prospect of an interruption in its access to negotiated rates as a result of the processes that it must participate in when it does business with the Postal Service, rather than with one of the Postal Service's competitors.

To avoid this result, the Postal Service respectfully requests that the Commission grant an additional brief extension of thirty (30) additional days, to allow the existing contract to remain in effect until such time as the Commission is able to complete its review of the successor contract. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for thirty (30) additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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