

BEFORE THE
POSTAL REGULATORY COMMISSION

Periodic Reporting
(Proposal Thirteen)

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Docket No. RM2015-7

**MOTION OF UNITED PARCEL SERVICE, INC. FOR LEAVE TO
FILE REPLY TO RESPONSE OF THE UNITED STATES POSTAL
SERVICE TO COMMISSION ORDER NO. 2792**

(March 4, 2016)

United Parcel Service, Inc. (“UPS”) respectfully submits this motion for leave to file a reply to the United States Postal Service response to Order No. 2792, which the Postal Service filed on February 16, 2016. Although the Commission’s rules do not authorize a reply to a response as a matter of right, the Commission may exercise its discretion to accept such a filing. See 39 C.F.R. § 3001.21(b).

This docket relates to Proposal Thirteen and the Postal Service’s model for the attribution of city carrier street time. As the Commission is aware, UPS extensively participated in this docket and, working with its economic expert, proposed an alternative approach that would evaluate all Postal products in a single model, relying upon operational data collected in the ordinary course of business. In Order No. 2792, the Commission approved Proposal Thirteen, given the limitations of existing operational data, but recognized the UPS approach “holds the potential to remedy many

of the measurement problems that arise from the use of separate models for parcel delivery.” See Dkt. No. RM2015-7, Order No. 2792 at 65 (Oct. 29, 2015).

Recognizing this potential, the Commission directed the Postal Service to evaluate the feasibility of utilizing its operational data in an alternative model akin to the one proposed by UPS. Now that the Postal Service has responded to the Commission’s directive, UPS requests leave to file a brief reply, which it has filed along with this motion for leave as a separate docket entry in accordance with instructions from the docketing clerk. In light of the close attention that UPS and its experts have given to the possibility of the Postal Service using operational data in an alternative model, UPS respectfully submits that these comments may assist the Commission’s evaluation of the appropriate next steps in this docket. Among other things, the proposed reply comments identify potential options for data collection the Postal Service may have overlooked.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

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