

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

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POSTAL RATE AND FEE CHANGES, 2006

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Docket No. R2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME  
TO PROVIDE COMMENTS ON NOTICE OF INQUIRY NOS. 2 AND 3  
(August 9, 2006)

Notice of Inquiry Nos. 2 (issued July 26, 2006) and 3 (issued July 26, 2006) invited interested participants, including the Postal Service, to comment on issues raised by Postal Service testimony proposing changes in basic and worksharing rates for First-Class Mail and Standard Mail.<sup>1</sup> Although arguably raising some different issues in each area, the NOIs focused on overlapping concerns about the applicability of the “presort tree” analysis to designing rates, and the effects of “delinking” mail categories using analytical and methodological approaches that differ from previous treatments in prior cases. Both NOIs raise issues of critical theoretical, practical, and policy importance for the rates for both First-Class Mail and Standard Mail.

Because of the press of activity associated with current hearings, involving witnesses whose testimony is implicated by the NOIs, as well as ongoing discovery responsibilities, and the need for thorough internal review, the Postal Service would benefit from additional time to develop comments on both NOIs. NOI No. 2 originally requested comments by August 4, 2006. NOI No. 3 extended that deadline to August

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<sup>1</sup> Notice of Inquiry No. 2, Docket No. R2006-1 (July 21, 2006); Notice of Inquiry No. 3, Docket No. R2006-1 (July 26, 2006).

10 for both NOI responses. The Postal Service believes that one additional week, until August 17, 2006, should provide sufficient time to provide responses.

The Postal Service has consulted several parties principally interested in the issues raised by NOI No. 3, who have agreed that additional time to respond would be advantageous. The Postal Service believes that no party interested in either NOI would be prejudiced by an extension, and that the record would benefit from more time to develop comments.

For the above reasons, the Postal Service respectfully requests that the deadline for filing comments to NOI No. 2 and 3 be extended to August 17, 2006.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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