

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
LATE ACCEPTANCE OF RESPONSE TO
PRESIDING OFFICER'S INFORMATION REQUEST NO. 12, QUESTION 8
(October 6, 2006)

The United States Postal Service hereby moves for late acceptance of the response to Presiding Officer's Information Request (POIR) No. 12, Question 8, issued August 24, 2006. This question addresses matters raised in Docket Nos. R2001-1 and MC2002-1 via Notice of Inquiry (NOI).¹ The NOIs reflect the Commission's interest in incorporating language in the DMCS regarding allowable combinations of special services. In testimony² and previous Comments,³ the Postal Service took the position that specifying in the DMCS the allowable combinations of special services compromised its flexibility in responding to mailer requests regarding additional combinations.

Presiding Officer's Information Request No. 12, Question 8, returns to the issue of whether the DMCS should define the allowable combinations of special services by noting observations made by the Postal Service when it withdrew its proposals for DMCS changes in Docket No. R2001-1 and inquiring whether there are "valid reasons for not reorganizing the DMCS special services as proposed in

¹ *Notice of Inquiry No. 1 Concerning DMCS Changes* (February 1, 2002), Docket No. R2001-1; *Notice of Inquiry No. 1 Concerning DMCS Changes* (May 16, 2002), Docket No. MC2002-1.

² USPS-T-36/R2001-1 (Susan W. Mayo) at 87-95.

³ *Notice Of The United States Postal Service Withdrawing Proposals And Submitting Revised Stipulation And Agreement* (February 13, 2002), Docket No. R2001-1; *Comments of United States Postal Service on Notice of Inquiry No. 1 Concerning Proposed DMCS Changes* (June 7, 2002), Docket No. MC2002-1.

the [Docket No. R2001-1] NOI.” The Postal Service believes there are such valid reasons, and understands that the Commission wants additional input from the Postal Service. Accordingly, the Postal Service has undertaken substantial additional analysis of this issue, which has occurred across various units within the Postal Service while requiring considerable additional time. Having completed that analysis and developed additional options that the Commission should consider, the Postal Service hereby requests late acceptance of its response to Presiding Officer’s Information Request No. 12, Question 8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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