

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

PUBLIC INQUIRY ON CHANGES ASSOCIATED  
WITH THE DELIVERING FOR AMERICA PLAN

Docket No. PI2023-4

**MOTION OF THE UNITED STATES POSTAL SERVICE TO  
EXTEND THE TIME TO RESPOND TO CHAIRMAN'S  
INFORMATION REQUEST NO. 1**

(June 27, 2023)

The United States Postal Service (Postal Service), in accordance with Rule 3010.162, respectfully moves the Postal Regulatory Commission (Commission) for a three-week extension of the time until July 19, 2023, to respond to Chairman's Information Request (ChIR) No. 1 as follows:

1. On April 20, 2023, the Commission initiated this proceeding to examine recent and planned network changes associated with the Delivering for America plan (Plan). Notice and Order Initiating Public Inquiry Associated with the Delivering for America Plan, Apr. 20, 2023 (Order No. 6488).
2. On May 5, 2023, the Postal Service filed a motion seeking reconsideration of Order No. 6488 and withdrawal of this docket. United States Postal Service's Motion for Reconsideration of Order No. 6488, May 5, 2023.
3. On June 21, 2023, the Commission denied the Postal Service's Motion for Reconsideration (Order No. 6548) and issued ChIR No. 1.

4. ChIR No. 1 seeks, among other things, details of plans under consideration related to the Postal Service's facilities network and projections, with supporting documentation, about cost savings anticipated over the ten years of Plan.

5. The Commission required responses to ChIR No. 1 within seven days, by June 28, 2023. The Commission also noted that given the Postal Service's concerns about this docket, the Postal Service could request the initiation of an informal technical conference.

6. Given the breadth and detail of the ChIR No. 1 requests, the Postal Service has determined that it will be unable to provide responses by June 28, 2023, and therefore requests a three-week extension of the time to respond until July 19, 2023. This will enable the Postal Service to fully assess Order No. 6548 and the specific questions posed in the ChIR, develop appropriate responses, and ensure all necessary internal reviews occur.

7. The requested extension of time will not adversely impact the procedural schedule as this proceeding is non-statutory and intended only "to garner information regarding proposed changes related to the [Plan]." Order No. 6488, at 4. Moreover, given the 10-year scope of the Plan and the fact that the initiatives that the Commission is inquiring about will be implemented over a multi-year period, the relatively short extension of time will not prejudice the declared purpose of this proceeding.

WHEREFORE, the Postal Service respectfully requests that the Commission extend the time to respond to ChIR No. 1 for three weeks until July 19, 2023.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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June 27, 2023