

**United States Court of Appeals  
District of Columbia Circuit**

333 Constitution Avenue, NW Washington, DC 20001-2866  
Phone: 202-216-7000 | Facsimile: 202-219-8530

Sai  
*Petitioner*

v.

Case Number: 14-1005

United States Postal Service (USPS)  
*Respondent*

**Motion to supplement the record**

Attached is the administrative record in this case, which I believe to be complete (including the the relevant PRC proceeding documents underlying and preceding my FOIA request).

I request that USPS certify the accuracy of all attached documents, and provide any parts of the record that are not attached.

**Index and summary of documents**

1. 2013-09-18 Request to the Postal Regulatory Commission to Add Private Address Forwarding to the Mail Classification Schedule.PDF

Sai filed a request with the Postal Regulatory Commission to add a new service, *Private Address Forwarding*.

2. 2013-10-16 Comments of The United States Postal Service in Response to Notice and Order Concerning Request to Add Private Address Forwarding to the Market Dominant Product List.pdf

Establishes the basis to believe that USPS possesses documents relevant to the public interest in this case by enumerating several specific programs previously considered by USPS, including three that reached the level of USPTO applications.

3. 2013-10-18 FOIA request for documents related to PAF.pdf

Initial FOIA request, including request for public interest fee waiver, expedited processing, and electronic format.

4. 2013-10-21 Petitioner's Motion for PRC Order for Disclosure of Related USPS Documents.pdf

Motion to PRC for subpoena ordering the same documents.

5. 2013-10-28 Reply of the United States Postal Service to Motion of Petitioner Seeking Order Authorizing Discovery.pdf

USPS' reply to motion for PRC discovery (further substantiating basis to believe USPS possesses documents requested by FOIA).

6. 2013-10-29 Petitioner's Response to USPS' Opposition to Discovery.pdf

Sai's response to USPS' opposition.

7. 2013-11-05 Order No. 1868 - Order Denying Motion for Disclosure.pdf

PRC denial of discovery motion on purely procedural grounds, leaving open the possibility of discovery at a later point in the proceeding.

8. 2013-11-06 USPS response re MC2013-60 FOIA request.pdf

USPS first, non-determinative response to the FOIA request, demanding a high search fee and failing to address fee waiver or expedited processing. *Note: this response was in violation of both FOIA's 20 working day and 10 calendar day response deadlines, and failed to provide a FOIA "determination".*

9. 2013-11-23 Follow up re FOIA failure to determine.pdf

Sai's response, requesting an actual determination of both matters and objecting to USPS' failure to comply with response deadlines.

10. 2013-11-25 FOIA 2014-FPRO-0057 fee estimate letter 2.pdf

USPS' initial negative determination of expedited processing and public interest fee waiver, failing to state a reason other than lack of information; included a partial response for how the request could be narrowed.

11. 2013-11-25 Response to USPS late reply on 2014-FPRO-0057.pdf

Sai's appeal of USPS initial negative determination, request for simultaneous processing of the narrowed portion and for further information on how the bulk of the request could be further narrowed.

12. 2013-11-28 FOIA Request 2014-FPRO-00057.pdf

Acknowledgment of response and interpretation as a limitation.

13. 2013-12-12 Sai Final Decision - Appeal 14-023.pdf

USPS final determination on appeal, denying expedited and public interest fee waiver requests,

based on Sai's "personal interest", claiming that PRC proceedings (which, perhaps uniquely among Federal agencies, have a statutory officer to represent the public interest) are not of public interest, and failing to address most of the elements of request assessment criteria. *Note: this response was in violation of FOIA's deadlines for appeals about expedited processing.*

14. 2013-12-24 FOIA request partial response 2014-FPRO-00057.pdf

USPS provision of a partial, narrowed portion of the request.

15. 2013-12-24 USPS SDS Physical to Virtual - Mail My Way Synopsis - 20130515.pdf

Attachment to the above.

16. 2013-12-24 Response to FOIA request partial response 2014-FPRO-00057.pdf

Request for stipulation that the narrowed portion in fact represented all responsive records outside the USPS Office of General Counsel, and for further information on how the OGC portions might be reasonably segregated.

17. 2014-01-10 RE FOIA request 2014-FPRO-00057.pdf

Acknowledgment of request for stipulation and referral thereof to another department.

Respectfully submitted,

Sai, *plaintiff pro se*

dccc@s.ai

+1 510 394 4724

PO Box 401159, San Francisco, CA 94110