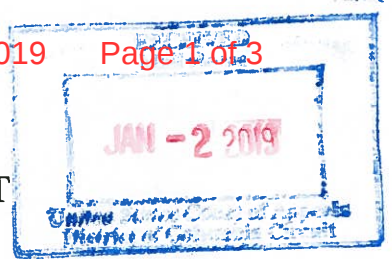


UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT



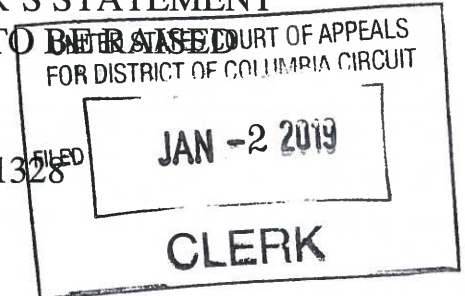
DOUGLAS F. CARLSON
Petitioner

v.

POSTAL REGULATORY COMMISSION
Respondent

)
) PETITIONER'S STATEMENT
) OF ISSUES TO BE RAISED

) Case No. 18-1328



As the petitioner, I expect to raise the following issues in this proceeding:

- 1. Whether the Postal Regulatory Commission ("Commission"), in issuing regulations establishing its system for regulating rates and classes for market-dominant products, exceeded its statutory jurisdiction, authority, or limitations, or was short of statutory right, by not requiring consideration of the objectives specified in 39 U.S.C. § 3622(b) and the factors specified in 39 U.S.C. § 3622(c) when reviewing Postal Service plans to raise rates in a rate-cap proceeding;
2. Whether the Commission abused its discretion or acted arbitrarily, capriciously, or otherwise not in accordance with law when it concluded, based on the information available to the Commission, that the Postal Service's plan to raise the price for one-ounce, stamped, First-Class letters from 50 cents to 55 cents "complied with the applicable statutory and regulatory requirements";
3. Whether the Commission's exercise of its statutory authority was reasonable and reasonably explained when the Commission issued its order

concluding that the Postal Service's plan to raise the price for one-ounce, stamped, First-Class letters from 50 cents to 55 cents "complied with the applicable statutory and regulatory requirements";

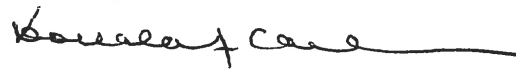
4. Whether the increase in the price for one-ounce, stamped, First-Class letters from 50 cents to 55 cents complies with applicable statutory and regulatory requirements;

5. Whether the Postal Service's Notice of Market-Dominant Price Change ("Notice") satisfied the Commission's requirement in 39 C.F.R. § 3010.12(b)(7) for a "discussion that demonstrates how the planned rate adjustments are designed to help achieve the objectives listed in 39 U.S.C. 3622(b) and properly take into account the factors listed in 39 U.S.C. 3622(c)";

6. Whether the Commission's acceptance of the discussion that the Postal Service provided in its Notice as satisfying the requirement in 39 C.F.R. § 3010.12(b)(7) was plainly erroneous, inconsistent with the regulation, arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.

Respectfully submitted,

Date: December 29, 2018




DOUGLAS F. CARLSON
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415-476-4527
Petitioner
Pro se

CERTIFICATE OF SERVICE

I certify that I served this Petitioner's Statement of Issues to Be Raised to the following person by First-Class Mail on December 29, 2018:

Joshua M. Salzman
Civil Division
United States Department of Justice
950 Pennsylvania Ave NW Rm 7258
Washington DC 20530-0001



DOUGLAS F. CARLSON