

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

POSTCOM RESPONSE TO THE  
UNITED STATES POSTAL SERVICE  
REQUEST FOR EXPEDITION

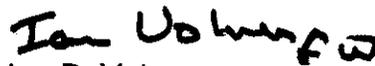
Without offering any mechanism for accomplishing the outcome that it seeks, the Postal Service has requested "maximum expedition in the litigation of its Request for a Recommended Decision." United States Postal Service Request for Expedition, 1. The Association for Postal Commerce (PostCom) has no principled objection to the relief requested and is confident that the PRC will, as it always has, do everything it can to move the case along with all dispatch consistent with the requirements of procedural due process.

The only expediting mechanism that has occurred to PostCom is to shorten the period available for the Postal Service, the party seeking expedition and the party able to bring the most resources to bear in accomplishing that end, to respond to interrogatories. A look at the procedural history of the last omnibus rate case, R2000-1, illustrates that this tactic is very unlikely to succeed. In that case the Postal Service filed no fewer than 160 motions for the late acceptance of interrogatory responses. We certainly intend no intimation that the Postal Service was proceeding at less than full speed in that proceeding. The point is that even with every effort to comply with timing rules, the Postal Service found

itself unable to consistently do so. Seeking to shorten that time seems doomed to failure as a mechanism for speeding the adjudication of this case.

Thus, it appears to PostCom that there is no artificial mechanism likely to result in a substantially speedier than usual recommended decision in what is, by almost any measure, a large and complex case. That is not to say that PostCom is not prepared to use its best efforts to assist in trying the case as quickly as is reasonable. It is to say that expectations of greater than usual speed in getting the case tried seem to PostCom unrealistic.

Respectfully submitted,



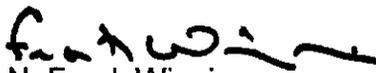
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Counsel for Association for Postal Commerce

October 11, 2001

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record to date in this proceeding in accordance with section 12 of the rules of practice.



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October 11, 2001