

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

Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE MOTION FOR LEAVE TO FILE
REPLY TO OPPOSITION OF UNITED STATES POSTAL SERVICE
TO OCA MOTION TO COMPEL PRODUCTION OF DOCUMENTS
REQUESTED IN OCA/USPS-64(c), 65-73, 77-78
(November 28, 2001)

The Office of the Consumer Advocate hereby moves for leave to file a reply to the Opposition of the United States Postal Service to the OCA's motion to compel the production of documents requested in OCA/USPS-64(c), 65-73, 77-78 ("Opposition").¹

The OCA reply is necessary to provide the Commission OCA's analysis of the guidelines attached to the Postal Service's Opposition that have not previously been available to the OCA. A fair reading of those newly available guidelines suggests that the Postal Service's claim that the requested documents are restricted from public dissemination by contractual agreement is not supported by the guidelines, all as set forth more fully in the OCA reply to the Postal Service's Opposition.

The OCA respectfully requests its motion for leave to file a reply to the Opposition of the Postal Service be granted.

¹ "Opposition of United States Postal Service to OCA Motion to Compel Production of Documents Requested in OCA/USPS-64(c), 65-73, 77-78," November 20, 2001.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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

Stephanie S. Wallace

Washington, D.C. 20268-0001
November 28, 2001