

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

CONFIRM

Docket No. MC2002-1

JOINT MOTION OF UNITED STATES POSTAL SERVICE  
AND OFFICE OF THE CONSUMER ADVOCATE FOR EXTENSION OF TIME  
TO RESPOND TO NOTICE OF INQUIRY No. 1, AND INTERIM REPORT ON  
SETTLEMENT DISCUSSIONS  
(May 29, 2002)

Notice of Inquiry No. 1 Concerning Proposed DMCS Changes, May 16, 2002 (hereafter NOI-1), requests that participants submit comments by May 30, 2002. NOI-1, at 2. Moreover, NOI-1 requests that any settlement agreement also address issues raised by NOI-1. *Id.* at 3. In telephonic discussion on May 29, 2002, the United States Postal Service and the Office of the Consumer Advocate reached general agreement on terms which can form the basis of a settlement agreement in this docket. At this time, however, those terms have not been reduced to writing.<sup>1</sup> Also, the general agreement does not yet extend to NOI-1. The Director of the OCA agreed that the Postal Service should file this motion, indicating that OCA joined it, seeking additional time until June 7, 2002 to consider issues raised by NOI-1 with the hope of including a response to NOI-1 in the settlement agreement. OCA and the Postal Service further agreed to discuss outstanding interrogatories.

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<sup>1</sup> At the Settlement Conference on the morning of the Prehearing Conference, no attendees other than the OCA indicated that any issues precluded their either joining a settlement agreement or agreeing not to oppose it. Once an agreement has been  
(continued...)

WHEREFORE, the United States Postal Service and Office of the Consumer Advocate jointly move for extension of time to submit comments on NOI-1 until June 7, 2002.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Kenneth Hollies

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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Kenneth Hollies

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(...continued)

reduced to writing, other participants will again be asked either to join the agreement or to forego opposing it.