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

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

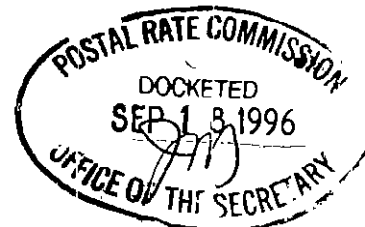
Docket No. MC96-3

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO NASHUA PHOTO, MYSTIC COLOR LAB, AND SEATTLE FILMWORKS
MOTION FOR EXPEDITED RESPONSE AND RULING ON PENDING MOTION TO
ENLARGE THE TIME WITHIN WHICH DIRECT TESTIMONY MUST BE FILED
(September 18, 1996)

The United States Postal Service hereby responds to the movants' September 17, 1996, Motion For Expedited Treatment of their September 12, 1996, Motion To Enlarge The Time Within Which Testimony Must Be Filed. In doing so, the Postal Service also formally indicates that, on September 23, 1996, it intends to file an Opposition to that September 12, 1996, Motion To Enlarge, as permitted by the Commission's Rules of Practice and Procedure, 39 C.F.R. § 3001.21(b).

In large part, that Opposition will rely upon the substance of responses to Nashua/Mystic interrogatories which the Postal Service expects to file by Monday, September 23, 1996, in compliance with Presiding Officer's Ruling MC96-3/10 (September 11, 1996).¹ On the basis of these interrogatory responses, the Postal Service's Opposition will explain why it considers the relief requested by the movants to be unwarranted. In determining whether Nashua/Mystic/Seattle's receipt of interrogatory responses on September 23, 1996, can be said to have

¹ All of which (as with this pleading) will be FAXed to the movants' counsel on the date of filing.



prejudiced their ability to timely propose their "relatively simple" Domestic Mail Classification Schedule change,² the Commission is invited to review the substance of the interrogatory responses in question and to determine whether the filing of those responses in accordance with Presiding Officer's Ruling No. MC96-3/10 -- as opposed to earlier -- can be said to have prejudiced the movants' ability to propose, on September 25, 1996, the relatively simple classification change they first articulated two months ago.

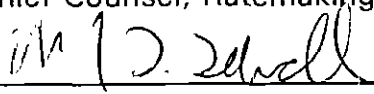
Because the arguments the Postal Service expects to make in its Opposition will rely upon the substance of the aforementioned interrogatory responses, the Postal Service considers that it would not be fair to require it to respond to the movants' Motion To Enlarge The Time Within Which Testimony Must Be Filed earlier than the filing of those interrogatory responses. Accordingly, the movants' Motion For Expedited Response should be denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 18, 1996

² Nashua/Mystic Motion To Enlarge Scope Of Proceeding For Consideration Of Classification Modification With Respect To Business Reply Mail, at 4. (July 15, 1996).

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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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