UNITED STATES OF AMERICA Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

RECEIVED

JAN 27 3 05 PM '00

POSTAL RATE COMMISSION OFFICE OF THE SPORFTARY

Mailing Online Experiment

Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE MOTION FOR ACCEPTANCE OF TESTIMONY ONE DAY AFTER THE SCHEDULED FILING DATE January 27, 2000

)

The Office of the Consumer Advocate (OCA) hereby requests that it be permitted to file the testimony of its witness James F. Callow, OCA-T-100, one day after the scheduled filing date of January 26, 2000. The late filing of Mr. Callow's testimony was unavoidable since all federal offices, including the offices of the Postal Rate Commission, were closed on January 26, 2000, due to hazardous road conditions.

The OCA wishes to make the Presiding Officer aware that it is prepared to withdraw Mr. Callow's testimony at a future time if the MC2000-2 participants can agree on functional equivalency language to be included in the Domestic Mail Classification Schedule (DMCS).² Over the past several days, the OCA, the Postal Service, and other active participants have exchanged views on possible DMCS language that would be satisfactory to all participants. The OCA is optimistic that a meeting of the minds can be

P.O. Ruling MC2000-2/3, "Presiding Officer's Ruling Establishing the Procedural Schedule and Limitation of Issues," December 21, 1999, established January 26, 2000, as the date for participants to file their cases-in-chief.

The Commission invited participants to propose DMCS language that would define services that are functionally equivalent or comparable to Mailing Online and which would authorize such services to enter mail at automation basic rates even if particular mailings did not meet minimum volume

achieved; however, agreement has not been reached yet. In order to maintain the procedural schedule established in Ruling No. 3, the OCA deems it prudent to file the testimony of witness Callow today and move forward with established procedures until such time that agreement on the functional equivalency language obviates the need for Mr. Callow's testimony.

Wherefore, the OCA moves that it be permitted to file OCA-T-100 one day late.

Respectfully submitted,

TED P. GERARDEN

Director

Office of the Consumer Advocate

Shelley A. Dreifuss

SHELLEY S. DREIFUSS Attorney

1333 H Street, N.W. Washington, D.C. 20268-0001 (202) 789-6830; Fax (202) 789-6819

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 section 12 of the rules of practice.

Stephanie Wallace

Washington, D.C. 20268-0001 January 27, 2000