

BEFORE THE POSTAL RATE COMMISSION
WASHINGTON, DC 20268

RECEIVED

JAN 27 4 17 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Charges for the)
Bulk Parcel Return Service) Docket No. C99-4

CONTINUITY SHIPPERS ASSOCIATION MOTION TO
CONTINUE HEARING FOR CROSS-EXAMINATION OF LARRY BUC
UNTIL FEBRUARY 2, 2000

The Continuity Shippers Association requests that the Postal Rate Commission continue the hearing set for the cross-examination of Larry Buc be scheduled for February 2, 2000.

In its Order No. 1276, the Commission required parties to state by January 24, 2000 whether they intended to conduct oral cross-examination of the CSA testimony of Larry Buc and set January 26-28, 2000 for the one-day hearing.

Only the Postal Service and the Office of Consumer Advocate filed notices on January 24, 2000. The Postal Service filed a notice stating that it did not intend on conducting cross-examination. The Postal Service's notice was posted on the Commission's website.

The Office of Consumer Advocate (OCA) filed a notice stating that it intended to cross-examine Larry Buc, the CSA witness. The OCA's notice was not posted on the Commission's website until January 27. Because of the lack of posting (due to the weather in the Washington DC area), counsel for the CSA was not aware of the OCA's intention to cross-examine Larry Buc,

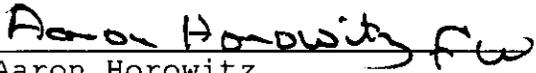
and did not make arrangements to be in Washington DC on January 28, 2000.

Counsel for the CSA has informed counsel for the Postal Service and the OCA of the circumstances. Counsel for the CSA suggested continuing the hearing until February 2, 2000. The Postal Service and OCA did not oppose a continuation of the hearing under these circumstances, and were available on February 2, 2000.

WHEREFORE, the Continuity Shippers Association requests that the hearing for the cross-examination of Larry Buc as witness for the CSA be held on February 2, 2000, as such other date as the Commission orders.

Dated: January 27, 2000

Respectfully Submitted,


Aaron Horowitz
200 Corporate Woods Parkway
Vernon Hills, IL 60061-3167
(847) 913-3360

Attorney for the Continuity
Shippers Association

CERTIFICATE OF SERVICE

This will certify that the foregoing Motion to Continue Hearing for Cross-Examination of Larry Buc was served on January 27, 2000, by telecopier and first class mail, on the following:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking
United States Postal Service
475 L'Enfant Plaza West, S.W.
Washington, DC 20260-1145

Timothy J. May, Esq.
Patton Boggs LLP
2550 M Street, NW
Washington, DC 20037-1350

John M. Burzio
Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N.W.
Washington, DC 20007-4403

Mr. Pierce Myers
Executive Vice President
Parcel Shippers Association
1211 Connecticut Ave, NW
Suite 610
Washington DC 20036

James R. O'Brien
Director, Distribution & Postal Affairs
Time, Inc.
Time & Life Building, 38th Floor
Rockefeller Center
New York, NY 10020-1393

N. Frank Wiggins
Venable, Baetjer, Howard
& Civiletti, LLP
1201 New York Avenue, NW
10th Floor
Washington DC 20005

John E. McKeever
Piper & Marbury, L.L.P.
2400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762

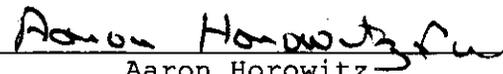
Gene Del Polito
Advertising Mail Marketing
Association
1901 N. Fort Myers Drive
Arlington, VA 22209-1609

Linda Shepherd
United Parcel Service
Corporate Strategy Group
55 Glenlake Parkway, NE
Atlanta, GA 30328-3498

Lawrence G. Buc
Project Performance Corp.
7600 Colshire Drive
McLean, VA 22102-7603

Dana T. Ackerly, Esq.
Covington & Burling
1201 Pennsylvania Ave, NW
PO Box 7566
Washington, DC 20044-7566

Mark L. Pelesh
John R. Przepyszny
Drinker Biddle & Reath LLP
1500 K Street NW
Suite 1100
Washington DC 20005


Aaron Horowitz