

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

)
) Docket No. R2000-1
)

COMMENTS OF
THE NEWSPAPER ASSOCIATION OF AMERICA
ON PROPOSED PROCEDURAL SCHEDULE
(February 14, 2000)

The Newspaper Association of America ("NAA"), hereby respectfully submits its comments on the proposed procedural schedule in this proceeding. NAA essentially concurs with the Alliance of Nonprofit Mailers *et al.*,¹ and United Parcel Service² that the proposed schedule would afford insufficient time for discovery and the preparation of intervenor direct cases. NAA believes that modest changes to the schedule would provide a more appropriate amount of time for these important aspects of the case.

NAA believes that the modifications suggested by either ANM *et al.* and UPS would improve the schedule, while still allowing the Commission approximately two months to prepare its decision after the close of briefing. As a compromise, the Commission could consider setting the date for reply briefs to fall in the first full week of September. And while the Commission need not, as UPS noted, make a definitive

¹ Suggested Modifications to the Procedural Schedule by the Alliance of Nonprofit Mailers, American Business Press, Dow Jones & Company, Inc., Magazine Publishers of America, National Newspaper Association, The McGraw-Hill Companies, Inc., and Time Warner Inc. (Feb. 9, 2000).

² Suggested Modifications of United Parcel Service To The Procedural Schedule (Feb. 14, 2000).

determination as to oral argument at this time, it is the experience of NAA that reply briefs are far more useful in these proceedings than oral argument.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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February 14, 2000

Certificate of Service

I hereby certify that I have this 14th day of February, 2000, caused to be served the foregoing document upon the United States Postal Service and the Office of the Consumer Advocate in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker
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