

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

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POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE AND FEE CHANGES
OFFICE OF THE SECRETARY
Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR EXTENSION OF TIME TO RESPOND TO POIR NO. 4

The Presiding Officer issued Presiding Officer's Information Request (POIR) No. 4 on February 25, 2000. The POIR indicated that the answer was to be provided within 10 days, which would translate into a filing no later than Monday, March 6. The Postal Service will be unable to respond by that date, and hereby moves for an extension of time to respond.

POIR No. 4 requests that the Postal Service provide data for an eleven-year period, in as consistent a format as possible. This is no small undertaking. As a first step, it requires an examination of postal data storage files and archives to determine exactly what information is available for each year. As the POIR itself acknowledges, data adjustments will be required to achieve as much consistency as possible. The POIR also (wisely) appears to grant the Postal Service some discretion in how to proceed, but this also creates the need to identify and assess various options, with the ultimate objective of making the results of the exercise as useful as possible.

Upon receiving POIR No. 4, the relevant postal personnel and consultants met to develop a response plan, make assignments, and agree on a time line for critical handoffs. The original time line suggested March 17th as the most likely completion date. In the last day or so, however, individuals have reported sufficient progress in advance of their scheduled handoffs to suggest that it now looks as if a response could be available by the end of next week (i.e., Friday, March 10th). To the extent that the fates have been benevolent thus far, however, their moods have been known to change without notice, and with significant consequences.

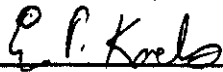
Based on the above, the Postal Service requests the following alternative forms of relief, in descending order of preference. The preferred relief would be to suspend the due date without establishing another. Under this scenario, the Postal Service would file its response as soon as it is available, hopefully by the end of next week. If changing circumstances create a situation in which the response is still not available on March 17th, the Postal Service would instead on that date file a status report. This approach avoids the need for further motions if the schedule slips. Alternatively, the due date could be reset at March 17th. Under this scenario, the Postal Service will still file the response as soon as it is available, but would have to file another motion for extension if that objective was not achieved by the 17th. A third possibility would be to set the next trigger date as March 10th, and have the Postal Service either file its response by then, or file a status report on that date.

Under any of these scenarios, the Presiding Officer can be assured that the Postal Service's staff will be working to providing a useful response as soon possible.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

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.



Eric P. Koetting

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