

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Docket No. R2000-1  
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Postal Rate and Fee Changes, 2000  
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**UNOPPOSED MOTION OF ALLIANCE OF NONPROFIT MAILERS  
FOR LEAVE TO FILE TO MOTION TO COMPEL OUT OF TIME  
(March 7, 2000)**

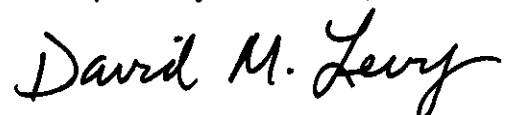
The Alliance of Nonprofit Mailers ("ANM") respectfully requests leave to file today its motion to compel responses to discovery requests ANM/USPS-T10-4, 7, 8, 10 and 11, three business days out of time. We are authorized to state that the Postal Service does not object to this motion.

These questions (reproduced in Appendix A to ANM's motion to compel, filed separately today) are part of two sets of questions asking the Postal Service to produce certain management analyses of the flat sorting machines and related equipment that the Service has deployed or plans to deploy. The Postal Service filed three sets of objections to the questions, on two separate dates. See Objection of the USPS to Interrogatories ANM/USPS-T10-4 *et al.* (filed Feb. 17, 2000); Objection of the USPS to Interrogatory ANM/USPS-T10-32(d) (filed Feb. 22, 2000); Objection of the USPS to Interrogatories of ANM to Witness Tayman (ANM/USPs-T9-18(j) *et al.*) (filed Feb. 22, 2000). Because each set of questions has prompted essentially the same objections, ANM believes that judicial economy would be served by dealing with all of the disputed questions in a single motion to compel.

ANM's motion to compel the Postal Service to answer the questions covered in its February 17 objections was due on March 2. ANM's motion to compel the Postal Service to answer the questions to which the Postal Service objected on February 22 is

due today. ANM believes that filing a combined motion today will prejudice no other participant.

Respectfully Submitted,

A handwritten signature in black ink that reads "David M. Levy". The signature is written in a cursive style with a large, prominent "L" and "V".

David M. Levy  
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*Counsel for Alliance of Nonprofit Mailers*

March 7, 2000

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David M. Levy

March 7, 2000