

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MAILING ONLINE EXPERIMENT

Docket No. MC2000-2

JOINT MOTION FOR EXTENSION OF TIME IN WHICH TO FILE REPLY BRIEFS
(March 20, 2000)

The United States Postal Service hereby moves for an extension of the time period during which reply briefs are to be filed in this proceeding. Under the current procedural schedule, reply briefs are required to be filed no later than Wednesday, March 22, 2000, one week after the submission of initial briefs. Despite the best efforts of Postal Service counsel and analysts to develop a reply brief in the allotted time, it has become apparent that the press of other business will make the filing of a thoughtful and informative brief extremely difficult.

Given the lack of intervenor testimony in this case, the parties' initial briefs raise a number of important factual assertions and arguments for the first time in this docket. Thus, the Postal Service's reply brief will be the only opportunity for it to respond to these matters.

In addition, as is apparent from the pleadings and submissions in this Docket and in Docket No. R2000-1, the attorneys and subject matter experts responsible for litigation of this proceeding are in most instances the very same individuals whose time and efforts are currently being demanded full-time in the omnibus rate case. That proceeding, moreover, has entered one of the most demanding periods for the Postal Service and its witnesses, that is, the height of discovery efforts relating to the direct

case of the Postal Service. In these circumstances, the Postal Service has concluded that it would not be able to brief the issues in this case in a manner that will be sufficiently helpful to the Commission.

The Postal Service believes that its proposal in this case is of sufficient importance to justify a short extension of time in which to provide comprehensive and well-reasoned reply briefs. Insofar as the Postal Service is the moving party in this case, moreover, any delay that might occur from such an extension is likely to harm no party's interests other than the Postal Service's. The Postal Service's does not believe that a short delay the filing of reply briefs or in the issuance of the Commission's recommended decision will interfere with its desire for timely implementation of its proposal. The Postal Service thus hereby moves for an extension of three business days to file its reply brief, until March 27, 2000. This extension would allow the Postal Service additional time following the completion of discovery on the Postal Service in Docket No. R2000-1 in order to focus on the reply brief in this case.

Counsel for MASA has been informed of the Postal Service's desire for an extension, and has authorize the undersigned to represent that MASA joins in this

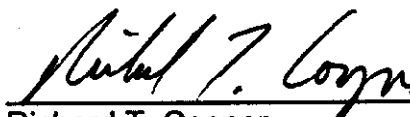
motion. Counsel for the OCA has informed Postal Service counsel that the OCA does not oppose this motion.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

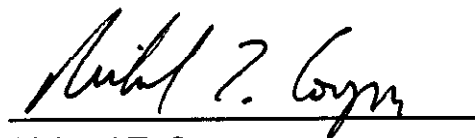
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", written over a horizontal line.

Richard T. Cooper
Attorney

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.

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", written over a horizontal line.

Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
March 20, 2000