

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

MOTION OF UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME TO  
FILE RESPONSE TO MOTION TO COMPEL  
(April 13, 2000)

National Newspaper Association (NNA) filed on April 6, 2000 its motion to compel responses to interrogatories NNA/USPS-T5-36 and 39. Those interrogatories sought certain information for each year as far back as 1986. The Postal Service had previously filed both a partial objection and a partial answer, while indicating that with the rush of interrogatories filed at the end of the period for discovery against the Postal Service direct case, it had been unable to tell how much information was available or how much burden would be associated with providing it.

Prior to oral cross-examination of witness Hunter (USPS-T-5), counsel for NNA addressed its outstanding motion to compel and indicated that discussions with the Postal Service regarding what reasonably could be provided were ongoing. Tr. 2/893. The undersigned counsel has been informed that witness Hunter expects to be able to complete further responses to interrogatories NNA/USPS-T5-36 and 39 by Friday, April 21, 2000, thereby identifying what information is available, unavailable, or available only at considerable expense or burden. The undersigned counsel would also like to have an opportunity to discuss these facts with counsel for NNA in the hope of arriving at a mutually satisfactory arrangement that renders moot the motion to compel and any response.

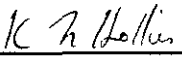
The Postal Service accordingly requests an extension of time until Tuesday, April 25, 2000 to reply to NNA's motion to compel. Counsel for NNA has authorized a statement herein to the effect that she does not oppose this requested relief.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Kenneth N. Hollies

**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.

  
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Kenneth N. Hollies

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April 13, 2000