

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

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO MAJOR MAILERS ASSOCIATION MOTION TO COMPEL  
(May 8, 2000)

The United States Postal Service hereby responds to the Motion to Compel filed by Major Mailers Association on May 3, 2000.

The MMA Motion pertains to the April 20, 2000, response of the Postal Service to MMA/USPS-T32-2. The MMA Motion appears to be premised upon a misunderstanding of the original response and of fundamental costing principles. Rather than respond to the arguments in the MMA Motion, the Postal Service considers that the more economical method of resolving this matter is to provide an even more detailed response to the interrogatory, in the hope that the revised response will make even more obvious those points the Postal Service thought were obvious in the first place. It is the expectation of the Postal Service that the revised response to MMA/USPS-T32-2 will render moot the MMA Motion to Compel.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

May 8, 2000

**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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Michael T. Tidwell

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May 8, 2000