

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

**REQUEST OF THE UNITED STATES POSTAL SERVICE
TO CONDUCT ORAL CROSS-EXAMINATION OF
PITNEY BOWES WITNESS MARTIN**

In accordance with Rule 30(e)(3) of the Rules of Practice and Procedure, the United States Postal Service hereby requests permission to conduct oral cross-examination of Pitney Bowes witness Martin concerning her testimony (PB-T-1) and her responses to interrogatories.

Preparation for cross examination of witness Martin is hampered by the fact that the responses to Postal Service and OCA interrogatories are overdue. Furthermore, the Postal Service is informed that the response to USPS/PB-T2-4(b) will consist of library references, the majority of which, will be submitted under protective conditions.

These circumstances cause the Postal Service to be concerned that it may be deprived of an adequate opportunity to prepare for cross-examination of witness Martin as scheduled. Accordingly, the Postal Service may request for relief from the Commission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

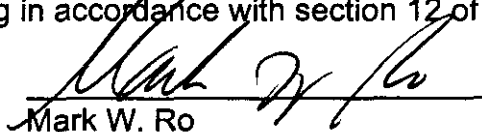
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Mark W. Ro

CERTIFICATE OF SERVICE

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



Mark W. Ro

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