

UNITED STATES OF AMERICA
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

JOINT MOTION OF
THE OFFICE OF THE CONSUMER ADVOCATE
AND UNITED PARCEL SERVICE
FOR EXTENSION OF TIME TO RESPOND TO
NOTICE OF INQUIRY NO. 4
(August 15, 2000)

To: Hon. Edward J. Gleiman
Presiding Officer

The Office of the Consumer Advocate ("OCA") and United Parcel Service ("UPS"), pursuant to Rule 21(a) of the Rules of Practice of the Postal Rate Commission ("Commission"), hereby jointly move for an extension of the time within which to respond to "Notice of Inquiry No. 4 Concerning Mail Processing Variability Models." The Notice was issued August 2, 2000, with responses due on August 16, 2000.

The subject matter of the Notice is both complex and important to the resolution of issues raised by the Postal Service in this proceeding. During the past two weeks, however, participants have been engaged in analysis of the further update materials, library references, and discovery responses relating to the extensive materials filed by the Postal Service in response to Order No. 1294, and in preparation of rebuttal and/or further testimony as permitted by Presiding Officer Ruling R2000-1/71. These activities

have impaired the ability of participants to devote adequate resources to responding to the Notice.

In order to provide an adequate opportunity for participants to respond to Notice, the OCA and UPS request that the time within which to respond to the Notice be extended to August 25, 2000. This would still permit cross-examination of any testimony filed in response to the Notice before the end of the hearings scheduled for August 23-September 1, 2000.

WHEREFORE, the OCA and UPS request that the time for responses to Notice of Inquiry No. 4 be extended to August 25, 2000.


Respectfully submitted,

Office of the Consumer Advocate

United Parcel Service



Ted P. Gerarden
Director



John E. McKeever
Attorney for United Parcel Service

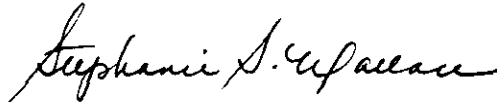
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Of Counsel

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.

A handwritten signature in cursive script, reading "Stephanie S. Wallace".

STEPHANIE S. WALLACE

Washington, D.C. 20268-0001
August 15, 2000