

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0000

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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 JOINT MOTION OF THE OCA AND UPS FOR EXTENSION  
OF TIME TO RESPOND TO NOI NO. 4  
(August 16, 2000)

The United States Postal Service hereby responds to the joint motion of the OCA and UPS, filed yesterday, to extend until August 25th the time to respond to NOI No. 4, which otherwise would be due today. The Postal Service stands ready to respond, and therefore does not join in the request for an extension. Moreover, while the Postal Service fully appreciates both the importance of the subject matter, and the wide range of equally-pressing tasks which have occupied all parties over the last several weeks, the Postal Service nevertheless opposes the length of the requested extension. The OCA and UPS are seeking 9 additional days, on top of the 14 days granted in the NOI.<sup>1</sup> Even if hearings are scheduled for the last day of hearings (September 1), this may leave too short of a period to analyze and prepare cross-examination on what would get filed on the 25th. Of course, there is no guarantee when hearings will be scheduled.

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<sup>1/</sup> Of some relevance here, it may be noted that neither UPS nor the OCA had occasion on August 14th to file rebuttal testimony on the mail processing variability analyses (although Dr. Neels, like Dr. Bozzo, did file rebuttal on unrelated matters). Therefore, unlike the Postal Service staff which was occupied with preparing or assisting with three lengthy pieces of rebuttal, the respective UPS and OCA mail processing experts should have had much better opportunity than the Postal Service to meet the original 14-day deadline. Moreover, despite the nearness of the scheduled deadline which the Postal Service was seeking diligently to meet, the Postal Service was neither consulted nor notified by telephone of the parties' intent to request that the deadline be moved.

Therefore, while the Postal Service does not necessarily oppose any extension, it does oppose the 9 days requested. The Postal Service would suggest at most a 5-day extension, such that all responses would be due on Monday, August 21st.

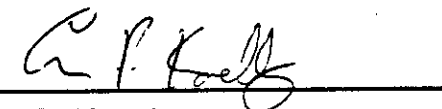
Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:



Susan M. Duchek



Eric P. Koetting

#### 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.



Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992, Fax -5402  
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