

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
Jul 12 4 23 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR EXTENSION OF TIME TO FILE A DISPOSITIVE MOTION
(July 12, 2001)

The United States Postal Service hereby respectfully requests, for the reasons stated below, that it be granted an extension of time within which to file a dispositive motion in response to the complaint in the above-captioned proceeding.

On or before July 19, 2001, in accordance 39 C.F.R. § 3001.84, the Postal Service is required to file its answer, a statement of its position on the allegations in the complaint, the facts and reasons in support of such position, as well as a statement of its position on the specific relief requested and whether hearings should be held, and a statement of facts in support of such position.

Upon receipt by the Postal Service, the complaint was assigned to undersigned counsel, on the basis of his unique familiarity with the subject matter of the complaint and his working relationship with clients regarding that subject matter. The Postal Service has prepared its answer and is filing it today. Because of personal travel commitments made for this month during October of last year,¹ upon receipt of the

¹ Last October, undersigned counsel organized a family gathering to take place during the 19th -22nd of this month, near Ft. Lewis, in the State of Washington. For good measure, counsel also arranged for his visit to Washington to begin with an attempt to reach the summit of Mt. Rainier from the 15th -17th.

complaint, undersigned counsel immediately enlisted client support in an effort to have the answer and any other responsive pleadings filed before his scheduled July 13th departure for Washington.

Despite the efforts of all involved since the filing of the complaint,² and because of the complexity of the allegations raised in the complaint, the Postal Service has not completed the work necessary to file what it expects will be a lengthy dispositive motion (accompanied by a detailed declaration) before counsel's departure tomorrow.³ Counsel is not scheduled to fly back to Washington, D.C. until Monday, July 23rd, and will return to the office on Tuesday, the 24th.

To accommodate these plans, undersigned counsel respectfully requests that the Postal Service be given until Monday, July 30th, to file its dispositive motion and accompanying declaration, which otherwise are due to be filed on July 19th.

The Postal Service is authorized to state that the Complainant has no objection to this request, subject to the following condition: if the Commission should grant the Postal Service's request, it should simultaneously extend the deadline for responding to the Postal Service's July 30th motion to August 14th, to accommodate Complainant's

² Some of the same clients also are responsible for assisting with Docket No. C2001-1; a Law Department computer system crash on Sunday, July 8th, prevented the accomplishment of any significant work on that date; and undersigned counsel lost a considerable portion of yesterday morning with the aftermath of catching his neighbor's son burglarizing his house at 5:30 a.m.

³ Because the summit attempt and related preparation takes place during the first half of the trip, counsel will not be able to have any meaningful contact with the office until July 18th. With all due respect for the importance of his postal obligations and the Commission's docket, it is counsel's desire to spend the remainder of the trip focused entirely on its intended purpose.

previously arranged vacation plans. The Postal Service has no objection to this condition.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
Ratemaking



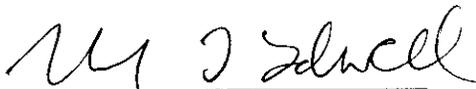
Michael T. Tidwell
Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

Douglas F. Carlson
P.O. Box 7868
Santa Cruz CA 95061-7868

David B. Popkin
P.O. Box 528
Englewood NJ 07631-0528



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998/ FAX: -5402
July 12, 2001