

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

COMPLAINT ON EXPRESS MAIL

Docket No. C2005-1

**MOTION OF UNITED STATES POSTAL SERVICE  
FOR EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT**  
(March 15, 2005)

On February 18, 2005, the Postal Rate Commission received a complaint filed by Douglas F. Carlson. The complaint alleges a variety of problems with Express Mail Service, including significant contractions in the Express Mail transportation and delivery network, both nationally and in specific geographical locations, recent curtailment of Sunday and holiday delivery, the establishment of a new "Second Delivery Day" service, dissemination of misleading or inaccurate information to customers regarding Express Mail service, and unfair and inefficient acceptance practices. Under the Commission's rules of practice and procedure, the Postal Service's Answer to the complaint is due on March 21, 2005.

Upon receiving the complaint, the Postal Service launched an investigation of its many factual allegations, and is in the process of preparing a response to each of its 51 paragraphs. However, due to the broad scope of the allegations made, involving events occurring throughout the nation, and requiring input from a large number of functional areas within the Postal Service, the process of investigating the allegations concerning Postal Service transportation, delivery, acceptance and communications has proven to be extremely time consuming, requiring a substantial burden of communication and coordination. This process of communication and coordination, moreover, has been

complicated and further slowed due to the fact that the Postal Service has been directed by its Board of Governors to prepare an omnibus rate case filing. This rate case preparation requires the time of many of the same personnel needed to respond to the complaint.

Under these circumstances, it will be impossible for the Postal Service to complete its response to the factual allegations made in the complaint in a timely fashion. The Postal Service estimates that in order to present a fully informed, thorough and accurate response to the many allegations, an extension of at least an additional month will be required. The Postal Service therefore moves that it be permitted to file its Answer to the complaint on April 21, 2005.<sup>1</sup>

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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March 15, 2005

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<sup>1</sup> The Postal Service sought Complainant's agreement to the proposed extension, but was unsuccessful in securing it, because it was not possible to meet Complainant's expressed need for specification of the exact date on which the rate case under preparation will be filed.

## **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.

Richard T. Cooper

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March 15, 2005