Postal Rate Commission
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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 ADDITIONAL EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT**
(April 21, 2005)

On February 18, 2005, the Postal Rate Commission received a complaint filed by Douglas F. Carlson. Under the Commission's rules of practice and procedure, the Postal Service's answer to the complaint originally was due on March 21, 2005. The Postal Service, on March 15, 2005, moved for an extension of time in which to file its answer, until April 21, 2005. On March 16, 2005, the Commission issued Order No. 1434, granting the Postal Service's motion.

As noted in the Postal Service's initial motion for extension of time, the Postal Service, since receiving the complaint, has devoted all available resources toward investigation of the many factual allegations contained in the complaint, which are broad in scope, and require input from a large number of functional areas within the Postal Service. Due to the need to prepare, and now litigate, the current rate filing, however, the amount of resources available to devote to the complaint continues to be significantly constrained. In this regard, the Postal Service notes that on the very day the Postal Service filed its rate proposals in Docket No. R2005-1, it received interrogatories concerning Express Mail service, and the Postal Service has received additional such interrogatories since. *See, e.g.* Interrogatories of David B. Popkin to the

United States Postal Service [DBP/USPS-1 through 29] (filed April 8, 2005), and Douglas F. Carlson Interrogatories to the United States Postal Service (DFC/USPS-1-19) (filed April, 14, 2005).

Despite continuing, diligent efforts to respond to the complaint's 51 paragraphs, the process of investigating the allegations concerning Postal Service transportation, delivery, acceptance and communications continues to be extremely time consuming. Thus, the Postal Service regrets that it will not be able to meet today's extended filing date, and will require additional time to complete its response. The Postal Service now estimates that in order to present a fully informed, thorough and accurate response to the many allegations, an extension of an additional two weeks will be required. The Postal Service therefore moves that it be permitted to file its Answer to the complaint on May 5, 2005.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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