

Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2005)

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE MOTION TO
REQUEST AN EXTENSION OF TIME TO FILE A MOTION TO COMPEL
RESPONSES TO INTERROGATORIES OCA/USPS-5 AND 6
(May 20, 2005)

On May 9, 2005, the Postal Service filed partial objections to Office of the Consumer Advocate (OCA) interrogatories OCA/USPS-5 and 6. These interrogatories concern Delivery Operations Information System (DOIS) training materials and the extraction of data from DOIS. The Postal Service indicates in its objection that DOIS training materials are only available on the Postal Service's intra-net and that extraction of DOIS data might be difficult and/or burdensome.

OCA and the Postal Service are working informally (and amicably) to resolve our disagreements over the requested materials. Of particular importance to resolving our differences is a meeting between respective experts scheduled for the end of next week. OCA will then be able to make an informed assessment of the utility of DOIS in preparing our direct case.

OCA contacted Mr. Koetting and asked if he would agree to an extension of time for an OCA motion to compel (if our disagreements cannot be resolved informally). He indicated that he has no objection to OCA's request for an extension.

Wherefore, OCA respectfully requests that the Presiding Officer grant OCA the opportunity to file a motion to compel, with respect to interrogatories OCA/USPS-5 and 6, at a later time, if necessary.

Respectfully submitted,

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