

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR EXTENSION OF TIME TO CONDUCT DISCOVERY
ON INTERVENOR TESTIMONY
(July 26, 2005)

In accordance with the terms of Presiding Officer's Ruling No. R2005-1/49 (July 12, 2005), the United States Postal Service hereby moves that the Commission extend by four calendar days the deadline for discovery on the intervenor testimony filed in this proceeding.

Presiding Officer's Ruling No. R2005-1/11 (May 19, 2005) originally established July 14, 2005, as the date for filing of intervenor testimony in this docket. Ruling No. R2005-1/49 adjusted that schedule to permit intervenor testimony to be filed five calendar days later, on July 19, 2005.

On that date, only one intervenor, Valpak, filed testimony. Presented by two witnesses, that testimony, to say the least, lacks neither depth nor breadth. Under the current case schedule, parties seeking to analyze the Valpak testimony and to conduct discovery now have five fewer days to do so than was contemplated by the original schedule. The Postal Service respectfully requests that the deadline for completion of discovery (and related August 5th notice filing requirements) be pushed back by four calendar days to August 9th.

Such an adjustment would permit a fairer opportunity for parties to more

thoroughly analyze the Valpak testimony, file interrogatories and to conduct any follow-up discovery before the Valpak witnesses take the stand. The current hearing schedule contemplates the Valpak testimony being entered into evidence and subjected to cross-examination during the week of August 22nd - 26th. Scheduling the hearings on that testimony later -- rather than earlier -- during that week would be consistent with the relief requested herein and should have no downstream impact on the remainder of the case schedule.

Accordingly, the Postal Service moves that the deadline for discovery on the Valpak testimony and related notice filing requirements be changed from August 5th to August 9th, 2005.

The Postal Service is authorized to represent that Valpak does not oppose this request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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