

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

REQUEST TO ADD
PRIVATE ADDRESS FORWARDING
TO THE MARKET DOMINANT PRODUCT LIST

Docket No. MC2013-60

**MOTION OF UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF THE FILING OF ITS OPPOSITION
TO MOTIONS SEEKING RECONSIDERATION OF THE PROCEDURAL SCHEDULE**
(October 16, 2013)

The United States Postal Service moves for late acceptance of the filing of its opposition to the motions filed on September 24 and 25, 2013, respectively by the Public Representative and the Petitioner seeking reconsideration of the procedural schedule published in Order No. 1838 (September 23, 2013).

Responses to these motions were due to have been filed on October 1 and 2, 2013, respectively, by which point the operations of the Commission, including the normal process for online filing and service of pleadings, was adversely affected. In large measure, the Postal Service's opposition to the motions is based on the substance of its October 16, 2013 Comments filed today in response to Order No. 1838. The substance of those Comments was developed on the basis of internal consultations with various departments within postal headquarters that were initiated with great diligence immediately after the issuance of that Order and completed yesterday. On the dates that the Postal Service's replies to the scheduling motions were due, the Postal Service was not in a position to conclude whether the expression of any opposition to the motions was appropriate or justified. Those consultations produced the substance of the Comments filed by the Postal Service today. As the direction and substance of

the Postal Service's response to Order No. 1838 coalesced, so did its view that (1) the issues raised by the Request are now framed by its Comments in a manner that affirms the wisdom of the procedural schedule in Order No. 1838, and (2) the September 24 and 25th proposals to change the schedule lack merit.

The Postal Service submits that parties obliged to file initial comments today are not prejudiced by the filing of the Postal Service's opposition today to the motions seeking to change the procedural schedule, as they have been on notice since before the government shutdown to file their initial comments today.

The Postal Service understands that the Commission may need to adjust the scheduled November 13th date for the filing of reply comments based on when it is able to resume full operations and declare that parties are on notice of pleadings filed today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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