

ORIGINAL

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

UNITED STATES POSTAL SERVICE MOTION FOR  
EXTENSION OF TIME TO FILE RESPONSE TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 1, QUESTIONS 9-10  
(July 22, 1996)

On July 12, 1996, the Presiding Officer issued Presiding Officer's Information Request No. 1 (POIR), consisting of 13 questions. The Postal Service has this day filed a timely response to 11 of those questions. The Postal Service hereby moves for an extension to file a response to questions 9 and 10.

Question 9 asks whether any Group 2 post offices provide general delivery but no city or rural carrier service, and, if so, analysis to determine how many boxes are involved. Because of a misunderstanding of the question, analysis was not begun in time to complete the response by today.

Question 10 requires a comparison of figures from witness Lyons' workpapers and a library reference underlying witness Lion's testimony. The response therefore requires the expertise of and coordination among the pricing, policy, and cost witnesses in this docket, all of whom are engaged in preparing responses to other discovery requests.

The Postal Service requests that it be permitted to file a response to question 9 tomorrow and a response to question 10 by Friday, July 26, 1996. The Postal Service submits that its request is reasonable, particularly since it has submitted timely responses to all other questions in the POIR. Additionally, a due date of July 26 for question 10 would be consistent with proposed Special Rule of Practice

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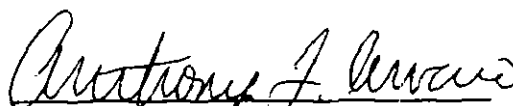
which establishes that answers to participants' discovery must be filed within 14 days of service of the discovery request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

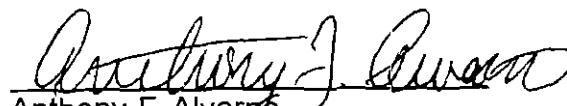
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anthony F. Alverno

#### 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.

  
Anthony F. Alverno

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July 22, 1996