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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

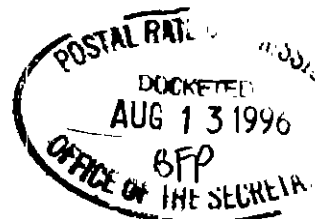
SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

MOTION OF UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME TO
RESPOND TO INTERROGATORIES OCA/USPS-T1-25 AND NAPUS/USPS-T1-1-2
(August 13, 1996)

The United States Postal Service hereby moves for extension of time to respond to the Office of the Consumer Advocate's interrogatory OCA/USPS-T1-25, filed July 30, 1996, and the National Association of Postmaster of the United States's interrogatories NAPUS/USPS-T1-1 and 2, filed on July 31, 1996. Interrogatory OCA/USPS-T1-25 requests the number of box customers who will pay \$0 under the Postal Service's proposal, and interrogatory NAPUS/USPS-T1-1 requests an estimate of revenue lost from the proposal to provide certain boxes at no charge. Interrogatory NAPUS/USPS-T1-2 requests the results of any studies regarding the number of Group II boxholders who may switch from box service to carrier service.

These three interrogatories concern the post office box revenue analysis in witness Lyons' Workpaper C. This workpaper is undergoing a detailed review as the Postal Service prepares its response to Presiding Officer's Information Request (POIR) No. 2. In particular, question 7 of POIR No. 2 requests revisions to Workpaper C, if current estimates in that workpaper are incorrect. Responses to the OCA and NAPUS interrogatories discussed above cannot be made with confidence of their accuracy until the Postal Service determines whether any revisions to Workpaper C are necessary. Therefore, the Postal Service moves for extension of



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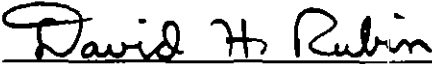
time to file its responses to those interrogatories until Friday, August 16, when responses to POIR No. 2 are due.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

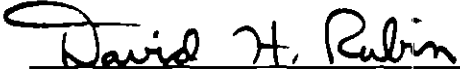
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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.



David H. Rubin

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August 13, 1996