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BEFORE THE RECEIVED
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001
AUG 16 4 33 PM '96

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

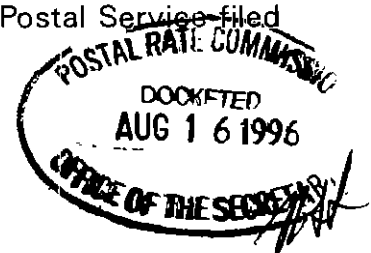
MOTION OF THE UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME
TO RESPOND TO PRESIDING OFFICER'S INFORMATION REQUEST NO.2,
QUESTIONS 4, 5, 7, 10, AND 14
(August 16, 1996)

On August 6, 1996, Presiding Officer's Information Request No. 2 was issued. The Postal Service requests an extension of time until Thursday, August 22, 1996 to respond to questions 4, 5, 7, 10 and 14.

Questions 4, 5, and 7 deal with what rates post office box holders will pay and what delivery groups they will be in under the Postal Service's proposals. The Postal Service has not had adequate time to coordinate among the various functional groups and witnesses required to respond.

Question 10 requests that the Postal Service complete exhibits concerning the number of post office boxes in various combinations of office group and box type under both the current and proposed classifications. Given the press of responding to the other questions in this Presiding Officer's Information Request as well as other discovery, the Postal Service has not had sufficient time to complete these detailed charts.

Question 14 requests the Postal Service to expand upon witness Patelunas's response to interrogatory OCA/USPS-T5-4, concerning the decline in attributable cost per transaction for certified mail from FY 1994 to FY 1995. Previously, on August 1, 1996, the OCA had directed interrogatory OCA/USPS-13 to the Postal Service addressing this same issue. On August 15, 1996, the Postal Service filed



a request for an extension of time until Thursday, August 22, 1996 to respond. The Postal Service indicated in its motion to extend that it currently is investigating a number of possible reasons for the decline and needs more time to respond. The Postal Service thus makes this same request for extension of time to respond to question 14.

If the Postal Service is able to file responses to these questions sooner than August 22, 1996, it will do so.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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.



Susan M. Duchek

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