

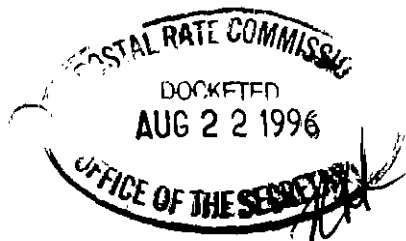
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY



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

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
EXTENSION OF TIME TO RESPOND TO INTERROGATORIES FROM
NASHUA/MYSTIC (NM/USPS-1-7)
(August 22, 1996)

On August 8, 1996, Nashua Photo and Mystic Color Lab (Nashua/Mystic) directed interrogatories NM/UPS-1 through 27 to the United States Postal Service.

On August 19, 1996, the Postal Service filed a Motion For Relief From Its Obligation To Respond To Interrogatories NM/USPS-8 through 27, pending the Commission's disposition of its August 16, 1996, Motion For Reconsideration of PRC Order No. 1129.

In accordance with PRC Order No. 1131 (August 20, 1996), the Postal Service will file tomorrow a supplemental pleading addressing the Commission's request for clarification of the grounds for the Motion For Reconsideration. PRC Order No. 1131 invites the Postal Service to address, among other things, the issue of whether the scope of Nashua/Mystic's inquiries is significantly broader than initially outlined in their July 15, 1996, Motion To Enlarge. The Postal Service will address this point in tomorrow's supplemental pleading, including the extent to which interrogatories NM/USPS-1 through 7 appear to significantly exceed the scope of the classification proposal that Nashua/Mystic would have the Commission consider in this proceeding.

Responses to NM/USPS-1 through 7 are due today. Notwithstanding the

importance the Postal Service places on timely responses to discovery requests, Docket No. MC96-3 witnesses who would be involved in preparing responses to these particular interrogatories, of late, have devoted their time to preparing responses to other discovery requests relevant to the scope of the case filed by the Postal Service, preparing for hearings, as well as juggling other non-Docket No. MC96-3 responsibilities and obligations.¹ Accordingly, the Postal Service has not been able to prepare responses to NM/USPS-1 through 7 in time for filing today.

Putting aside the impact of any relief the Commission may grant in response to the August 19, 1996, Postal Service Motion For Reconsideration and the supplemental pleading to be filed tomorrow, the Postal Service anticipates that it can prepare responses to interrogatories NM/USPS-1 through 7 for filing by Friday, September 6, 1996. Accordingly, the Postal Service respectfully requests leave to respond to interrogatories NM/USPS-1 through 7 by that date.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:
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August 22, 1996

¹ Some of the interrogatories require analysis of information filed in Docket No. R94-1 and other data on special services not at issue in this proceeding.

- 3 -

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.


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