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

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OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

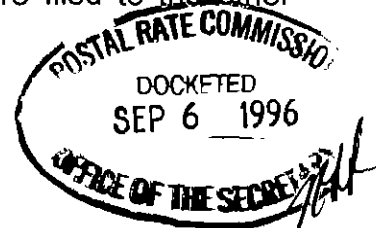
Docket No. MC96-3

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
SECOND EXTENSION OF TIME TO RESPOND TO INTERROGATORIES FROM
NASHUA/MYSTIC (NM/USPS-1-6)
(September 6, 1996)

On August 8, 1996, Nashua Photo and Mystic Color Lab (Nashua/Mystic) directed interrogatories NM/USPS-1 through 27 to the United States Postal Service. On August 22, 1996, the Postal Service moved for an extension of time until today to respond to NM/USPS-1-7.¹ The time needed to respond was gauged based on the press of other discovery matters and hearing preparation. Subsequently, on August 29, 1996, Presiding Officer's Information Request No. 3 was issued, setting a deadline of September 5, 1996 -- allowing seven calendar days and four business days for witnesses to respond. The Postal Service has given priority to responding to POIR No. 3 and, accordingly, has not been able to prepare responses to NM/USPS-1 through 6 in time for filing today. In fact, not all responses to POIR No. 3 will be ready for filing today.

The Postal Service anticipates that it can prepare responses to interrogatories NM/USPS-1 through 6 for filing by Friday, September 13, 1996. As the Postal Service has not received indication that Nashua/Mystic plan to conduct oral cross-examination of any of its witnesses, it is not believed that anyone will be

¹ A response to NM/USPS-7 if being filed today. Objections were filed to the other interrogatories in that set.



prejudiced by the requested extension. Accordingly, the Postal Service respectfully requests leave to respond to interrogatories NM/USPS-1 through 6 by Friday, September 13, 1996.

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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September 6, 1996