

00567 ORIGINAL

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
PRESIDING OFFICER'S INFORMATION REQUEST NO. 4
(October 11, 1996)

The United States Postal Service hereby moves for a three-day extension of time to respond to Presiding Officer's Information Request (POIR) No. 4, filed October 2, 1996. Most of the questions in this POIR require considerable review and coordination of the responses, not only among various witnesses, but also among others, including implementation team members and cost analysts. In addition, there are other pressing demands on the witnesses and others involved in preparing responses, including review of intervenor testimony, preparation of discovery, responding to discovery, and preparation of other potential pleadings and filings for the Commission. Finally, some key people who must be consulted will not be available between now and the original due date. For these reasons, the Postal Service respectfully moves for extension until Friday, October 18, 1996, to provide its



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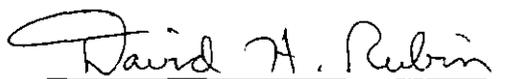
responses. Notwithstanding this request, the Postal Service will endeavor to file as many of its responses as possible prior to October 18.¹

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

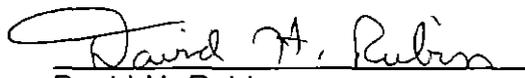
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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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October 11, 1996

¹ For example, responses to question 7, 8, 9, and 12 are expected to be ready before October 18.