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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

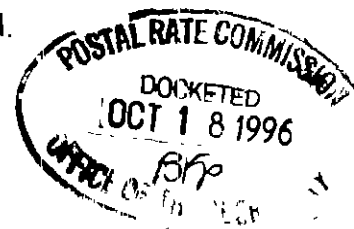
Docket No. MC96-3

SECOND MOTION OF UNITED STATES POSTAL SERVICE FOR
EXTENSION OF TIME TO RESPOND TO
PRESIDING OFFICER'S INFORMATION REQUEST NO. 4
(October 18, 1996)

The United States Postal Service hereby respectfully moves for an additional three-day extension of time to respond to questions 1 through 6, 10, and 16(c) of Presiding Officer's Information Request (POIR) No. 4, filed October 2, 1996. Presiding Officer's Ruling No. MC96-3/20 granted an extension until today for responding to this POIR.

Questions 1 through 6 involve discussion of a wide variety of implementation issues arising from the post office box proposal. In an attempt to provide as complete responses as possible, the Postal Service has involved individuals from different functional areas to help prepare the answers. In fact, the Postal Service intends to provide a new witness with delivery expertise to respond to several of these questions. Unfortunately, this effort requires considerable coordination and editing, and thus takes time. The two-day extension will allow for final review and editing of the responses.

Question 10 requires identification of data sources, completion of analysis, and preparation of a response, by individuals who otherwise are involved with duties unrelated to this case. The response has not yet been completed.



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The response to question 16(c) is being completed by a different individual than the one who is sponsoring the remaining parts of question 16, and requires as input the responses to those other parts. Following the recent completion of that input, the respondent to question 16(c) has not had enough time to complete a response

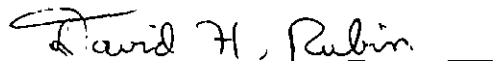
Therefore, the Postal Service respectfully requests an additional extension of time for completing these answers, until Wednesday, October 23.

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 18, 1996