005782 ORIGINAL

BEFORE THE RECEIVED POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-00007 28 4 35 PM '96

> POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Docket No. MC96-3

SPECIAL SERVICES REFORM, 1996

MOTION OF UNITED STATES POSTAL SERVICE FOR ONE-DAY EXTENSION OF TIME TO RESPOND TO OCA/USPS-54(e) (October 28, 1996)

The United States Postal Service hereby requests a one-day extension of time until Tuesday, October 29, 1996 to file a further response to OCA/USPS-54(e). Presiding Officer's Ruling on OCA Motion to Compel, Presiding Officer's Ruling No. MC96–3/21, issued October 18, 1996, ruled that the Postal Service should file a further response to the cited interrogatory.

The Postal Service is not able to produce the information requested in the interrogatory, as it has indicated in its earlier responses. The Postal Service, however, believes that its earlier responses may not have not been sufficiently clear, and may have led to a basic misunderstanding concerning why it does not have all of the information necessary for the type of response contemplated by the Presiding Officer's Ruling. The Postal Service convened a work group to prepare a more detailed response, which will seek to clearly explain why the requested information cannot be produced. This work group has held several meetings and has spent all day today trying to complete the response, but still needs additional time to finish review, editing and production. Accordingly, the Postal Service respectfully requests a one-day extension of time.



- 2 -

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

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2990; Fax -5402 October 28, 1996