

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

MOTION OF UNITED STATES POSTAL SERVICE
FOR EXTENSION OF TIME IN WHICH TO RESPOND TO
NDMS MOTIONS TO COMPEL RESPONSES TO
INTERROGATORY NDMS/USPS-T33-10
TO WITNESS SHARKEY
(September 2, 1997)

On August 11, 1997, the United States Postal Service filed objections to interrogatory NDMS/USPS-T33-10b, filed on August 1, 1997. On August 25, 1997, NDMS moved to compel a response to interrogatory 10, and on August 29, 1997, supplemented this motion. While the Postal Service maintains its objections to this interrogatory, recent consultations with counsel for NDMS make it appear that this discovery dispute can be resolved informally without resort to further motions practice. For this reason, the Postal Service hereby requests an extension of time until September 12, 1997 in which to respond to both NDMS motions to compel. It is hoped that this procedure will facilitate the production of information sought by NDMS, while offering maximum protection to the interests of the Postal Service.

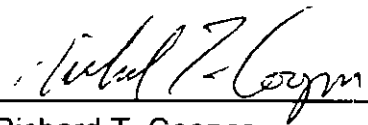
The Postal Service has been authorized by counsel for NDMS to state that NDMS supports this motion for extension.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

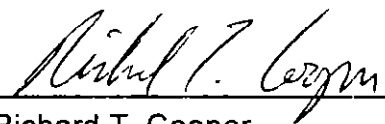


Richard T. Cooper

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(202) 268-2993; Fax -5402
September 2, 1997

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.



Richard T. Cooper

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September 2, 1997