

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

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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME  
TO RESPOND TO MOTION OF NDMS  
TO STRIKE PORTION OF TESTIMONY OF WITNESS FRONK**  
(September 5, 1997)

On Friday, August 29, 1997, Nashua, District, Mystic & Seattle (NDMS) filed a motion requesting that the Commission strike a portion of the direct testimony of Postal Service witness David Fronk (USPS-T-32). The response to that motion is due to be filed today. The Postal Service requests an extension in the deadline for that response.

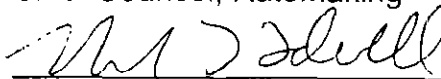
NDMS counsel sent a copy of the motion by facsimile to Postal Service counsel late on the afternoon that the motion was filed in order to maximize the Postal Service's ability to file a timely response by today. Efforts by undersigned counsel to do so have been eclipsed by his responsibilities related to the provision of advice to postal management in connection with yesterday's issuance by the Commission of its *Opinion and Recommended Decision in Docket No. MC97-4, a matter which is on the agenda* for the meeting of the Board of Governors of the Postal Service next Monday and Tuesday, September 8 and 9, 1997. As a consequence, counsel respectfully requests a two working- (four calendar-) day extension in the deadline for response to the NDMS motion in order to file the Postal Service's response on Tuesday, September 9, 1997. The undersigned counsel has discussed this motion for extension with counsel for NDMS and is authorized to state that he does not oppose it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

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September 5, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Michael T. Tidwell

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September 5, 1997