

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

---

**RATE AND SERVICE CHANGES TO  
IMPLEMENT BASELINE NEGOTIATED  
SERVICE AGREEMENT WITH BOOKSPAN**

---

**DOCKET NO. MC2005-3**

**MOTION OF BOOKSPAN FOR ACCEPTANCE OF LATE-FILED RESPONSES  
TO INTERROGATORIES OF THE  
NEWSPAPER ASSOCIATION OF AMERICA AND THE  
OFFICE OF THE CONSUMER ADVOCATE**

**(August 30, 2005)**

Bookspan hereby moves that the responses of Witnesses Epp and Posch to the following interrogatories listed below be accepted out of time. Responses could not be fully prepared and timely filed because the witnesses were not available due to August vacations that were scheduled prior to the issuance of the procedural schedule in this proceeding. Bookspan does not believe that any party will be prejudiced by this delay.

This motion applies to responses to following interrogatories filed today:

NNA/USPS-T1-1  
OCA/USPS-T1-10(a) and (c)  
OCA/USPS-T1-13(c) and (d)  
OCA/BOOKSPAN-T2-6 and 7  
OCA/BOOKSPAN-T1-1 through 3

Respectfully submitted,

Ian D. Volner  
Rita L. Brickman  
Matthew D. Field  
Venable LLP  
575 7<sup>th</sup> Street, NW  
Washington, DC 20004-1601  
(202) 344-4814  
[idvolner@venable.com](mailto:idvolner@venable.com)  
Counsel to Bookspan

DC2:\677349