

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

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

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**DOCKET NO. MC2005-3**

**MOTION OF BOOKSPAN FOR ACCEPTANCE OF LATE-FILED RESPONSES  
TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE  
OCA/USPS-T1-10(a) AND (c) AND OCA/USPS-T1-13(c) AND (d)**

**(August 31, 2005)**

On August 30, 2005, Bookspan filed a motion for late acceptance of responses that applied to responses presented in four different documents ("August 30 Motion"). At the request of the Commission's docketing staff, Bookspan is now filing separate motions applicable to each document filed.

Bookspan hereby moves that the response of Witness Posch to the interrogatories numbered OCA/USPS-T1-10(a) and (c) and OCA/USPS-T1-13(c) and (d) filed on August 30 be accepted out of time.<sup>1</sup> A response to this interrogatory could not be fully prepared and timely filed because the witness was not available due to an August vacation that was 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.

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<sup>1</sup> A motion for a protective order is pending with respect to the filing of responses to OCA/USPS-T1-10(b) and (d) and OCA/USPS-T1-13(a) and (b). See Bookspan Motions for Protective Order filed August 23 and 30, 2005.

To the extent that the August 30 Motion applies to these particular responses, that motion is withdrawn.

Respectfully submitted,

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