

**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
OFFICE OF THE CONSUMER ADVOCATE
OCA/BOOKSPAN-T1-1 - 3**

(September 1, 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 a separate motion applicable to each document filed.

Bookspan hereby moves that the response of Witness Posch to the interrogatories numbered OCA/BOOKSPAN-T1-1 through 3 filed on August 30 be accepted out of time. 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. To the extent that the August 30 Motion applies to these particular responses, that motion is hereby withdrawn.

Respectfully submitted,

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