

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-8001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF RESPONSES TO NATIONAL NEWSPAPER ASSOCIATION INTERROGATORIES

The United States Postal Service hereby moves for late acceptance of its responses to National Newspaper Association interrogatories NNA/USPS-T30-3 and 4. These interrogatories were filed on September 5, 1997. The answers were due to have been filed on September 19, 1997.

The delay in responding to NNA/USPS-T30-3 is attributable to a combination of circumstances. The nature of the requested information being disclosed required extensive internal consultations throughout several layers of postal management in several departments. Timely completion of these consultations was made more difficult by the occasional unavailability of critical personnel during the process. Preparation for and participation in hearings last week by witness O'Hara and counsel further delayed the "closing of the loop" internally. Finally, counsel's unavoidable absence from the office from October 10th through the 14th resulted in the responses not being ready to be filed until today.

The delay in responding to T30-4 is attributable to the fact that the search for the requested documents took much longer than expected.

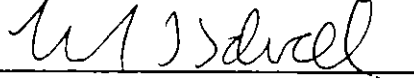
The Postal Service regrets the delay in filing these responses and will fax copies to counsel for NNA today to mitigate the effects of the delay which has transpired to-date.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

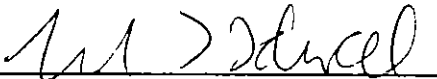


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CERTIFICATE OF SERVICE

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

October 16, 1997