

## DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**MOTION FOR LATE ACCEPTANCE OF  
UNITED STATES POSTAL SERVICE  
RESPONSES TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-44 - 53, 64- 68, 70)**

The United States Postal Service hereby moves for late acceptance of its filing today of responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-44 through 53 (filed September 8, 1997) and OCA/USPS-64 through 68 and 70 (filed September 12, 1997).

These responses were due to have been filed on September 22 and 26, 1997, respectively. Postal Service counsel received a telephone call from OCA counsel on Monday, October 20, 1997, inquiring about the responses.

All indications are that both sets of interrogatories were received in a timely manner, but that a breakdown in the distribution of the first set resulted in the appropriate persons not being aware of their existence until the OCA's inquiry. The exact source of this breakdown is unclear. This is a regrettable development, but one which is inevitable on occasion, given the blizzard of rate case documents that comes in during discovery. Since the call from the OCA, the Postal Service has worked diligently to mitigate the harm caused by this delay and has produced responses today.

With respect to the second set, the delay in responding is attributable to a combination of factors. The set was distributed to the various departments which would be responsible for producing responses. It would appear that (1) counsel responsible

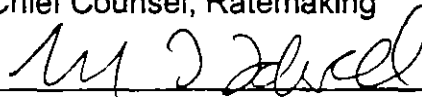
for overseeing that responses were produced in a timely fashion have been sidetracked by preparation for and participation in hearings (not to mention motion practice) and that (2) there was a breakdown in communication between counsel and the responsible departments. As a consequence, it took a reminder from the OCA to prompt the completion of the circulation and review of draft responses. This is an equally regrettable lapse which the Postal Service wishes it could have avoided.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

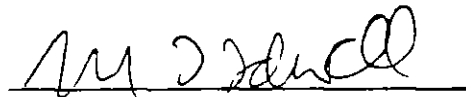


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October 24, 1997

#### 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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October 24, 1997