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

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE GOME COOM OFFICE OF THE SECULIARY Docket No. R97-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF RESPONSES TO INTERROGATORIES OF DOUGLAS CARLSON (DFC/USPS-11 and 12) (November 20, 1997)

The United States Postal Service hereby moves for late acceptance of its filing of responses to the above-referenced interrogatories of Douglas Carlson, dated October 20, 1997. The responses were due to have been filed on November 3, 1997.

The search for information responsive to DFC/USPS-12 required that a number of Headquarters departments be contacted. Although none was able to identify any responsive information, one chain of contacts ultimately led to the identification of knowledgeable Address Management personnel in Memphis, TN. Responsive information was transmitted back to Headquarters and prepared in the form of an interrogatory response. It was intended that a sample mail piece be attached to the response. As a consequence, filing of the response has been on hold, pending the location and transmission of such a sample to Headquarters. Unfortunately, that has not occurred. To avoid any further delay, a response to DFC/USPS-12 has been prepared which commits the Postal Service to providing a sample as soon as one can be located.

The response to DFC/UPS-11 was being held in the vain belief that some economies could be achieved by filing the two outstanding responses together, rather than under separate cover. The Postal Service regrets the delay, but believes that, given the substance of

the questions and the responses, there has been no prejudice to any party.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

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Michael T. Tidwell

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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.

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Michael T. Tidwel

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 November 20, 1997