

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION
DOCKET NO. R97-1
OFFICE OF THE SECRETARY

**UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE
OF RESPONSES OF WITNESS SHARON DANIEL TO
NASHUA, DISTRICT, MYSTIC & SEATTLE INTERROGATORIES
(NDMS/USPS-ST43-4, 17, 18)
(November 21, 1997)**

The United States Postal Service hereby moves for late acceptance of responses filed yesterday to the following interrogatories of Nashua, District, Mystic & Seattle, dated November 5, 1997: NDMS/USPS-ST43-4, 17, and 18. These responses were due to have been filed on November 12, 1997.

In addition to the reasons cited in the October 14, 1997, motion for late acceptance of witness Daniel's responses to NDMS interrogatories, the responses filed yesterday are late because:

NDMS/USPS-ST43-4 required a comprehensive review of the litigation of nonstandard surcharge costs and rates since Docket No. R78-1 which could not be completed in the abbreviated time period for response;

NDMS/USPS-ST43-17 required the production of modified mailflow diagrams and tables which was postponed in order to permit witness Daniel to prepare as many other NDMS interrogatory responses as possible on November 14, 1997 and to expedite the production of responses to interrogatories which have redirected to the Postal Service for response;

NDMS/USPS-ST43-18 required reference to data which originate in USPS-LR-H-106 (incorporated by reference in USPS-ST-45 by witness Smith). These H-106 data are being corrected by very minor errata which -- because of witness Smith's inability to avoid a bout of influenza -- were not be completed and filed until today. The errata affect some of the numbers to which ST43-18 seeks confirmation. The Postal Service had hoped to file the response to ST43-18 and the errata simultaneously, but determined that the delay in production of the latter should not delay the filing of the former any further than it already had.

Accordingly, these responses are late by a total of eight days. The Postal Service considers this tardiness unfortunate, but unavoidable under the circumstances. To mitigate any prejudice caused by this delay, facsimile copies of the responses were transmitted to counsel for NDMS yesterday.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 21, 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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November 21, 1997