

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**MOTION FOR LATE ACCEPTANCE OF RESPONSES
OF UNITED STATES POSTAL SERVICE
WITNESS SMITH TO INTERROGATORIES OF
NASHUA & DISTRICT & SEATTLE & MYSTIC
REDIRECTED FROM WITNESS CRUM
(NDMS/USPS-T28-38(d) AND 41(i))
(December 1, 1997)**

The United States Postal Service hereby moves for late acceptance of the responses of witness Marc Smith to the following interrogatories of NDMS, filed November 14, 1997: NDMS/USPS-T28- 38(d) and 41(i).

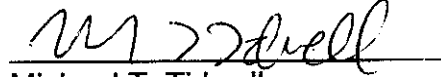
The responses were due to have been filed on November 21, 1997. The determination to redirect the interrogatories to witness Smith was not made until shortly before that deadline, leaving him with an insufficient amount of time within which to file timely responses. Witness Smith's preparation for and participation in the November 28, 1997, technical conference further interfered with the preparation and review of the responses. Consequently, the answers could not be filed until today. The Postal Service regrets this delay, but regards it as unavoidable. To mitigate any prejudice this delay may have caused, the Postal Service has transmitted a facsimile copy of the responses to NDMS counsel.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

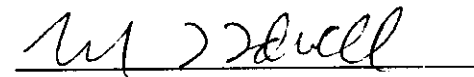


Michael T. Tidwell

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December 1, 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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December 1, 1997