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

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OFFICE OF THE SECRETARY

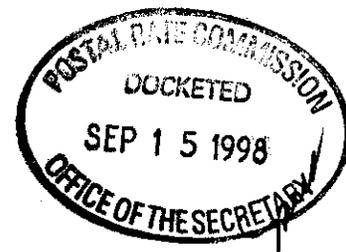
MAILING ONLINE SERVICE

Docket No. MC98-1

MOTION OF UNITED STATES POSTAL SERVICE
FOR EXTENSION OF TIME TO RESPOND
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
TO WITNESS SECKAR (OCA/USPS-T2-11-16)
(September 15, 1998)

The United States Postal Service hereby moves for an extension of time, until October 2, 1998, to respond to Office of the Consumer Advocate interrogatories OCA/USPS-T2-11-16 to witness Seckar, filed on September 9, 1998. These interrogatories were filed too late for responses to become part of the record in the market test phase of this proceeding. Moreover, the Postal Service is focusing its resources on completing initial and reply briefs until September 25, 1998. Finally, the Postal Service believes that responding to these interrogatories will involve input from several of its witnesses (and attorneys). The Postal Service therefore requests that the deadline for responding be extended until October 2, 1998. This extension would allow the Postal Service five working days to respond after completion of its reply brief.

The Office of the Consumer Advocate has informed the Postal Service that the OCA has no objection to the Postal Service's requested extension. Since renewed consideration of the Postal Service's Request for an experimental Mailing Online



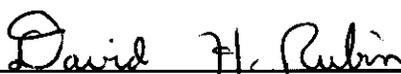
service will only just be starting on October 2, the Postal Service does not believe that parties will be prejudiced by the requested extension.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

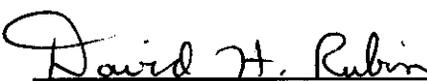
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin

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September 15, 1998