

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

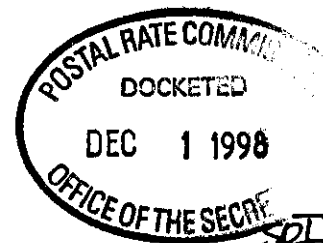
Docket No. MC98-1

MOTION OF UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF
RESPONSES TO INSTITUTIONAL
INTERROGATORIES OF THE OCA (OCA/USPS-7-9)
(December 1, 1998)

The United States Postal Service hereby moves for late acceptance of the responses to interrogatories of the Office of the Consumer Advocate directed to the Postal Service as an institution (OCA/USPS-7-9).

The responses are being filed late largely because of when they were filed, two days before the commencement of hearings on the Postal Service direct case. Counsel, witnesses, and various support personnel needed to concentrate on the hearings, and then on the extensive homework assignments that arose during the hearings. Further, the responses fell due on the day after Thanksgiving, when most of the involved personnel were not physically present. Finally, illness made one key player unavailable on Monday, November 30. No party should be prejudiced by this late filing, especially in light of current uncertainty regarding the procedural schedule.

WHEREFORE, the United States Postal Service moves for late acceptance of its institutional responses to interrogatories OCA/USPS-7-9.

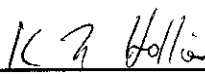


Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

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.



Kenneth N. Hollies

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December 1, 1998