

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

**RATE AND SERVICE CHANGES TO
IMPLEMENT BASELINE NEGOTIATED
SERVICE AGREEMENT WITH BOOKSPAN**

DOCKET NO. MC2005-3

**MOTION OF BOOKSPAN FOR ACCEPTANCE OF LATE-FILED RESPONSE
TO REDIRECTED INTERROGATORY OF THE
OFFICE OF THE CONSUMER ADVOCATE
OCA/USPS-T2-14**

(September 2, 2005)

On August 19, 2005, Bookspan timely filed a motion for a protective order applicable to OCA/USPS-T2-14. The Commission issued a protective order on August 23, 2005 (POR-4).

Bookspan hereby moves that the response of Witness Posch to the interrogatory numbered OCA/USPS-T2-14, being filed under seal today, be accepted out of time. A response could not be filed until after issuance of the protective order. Bookspan is filing a response to this interrogatory as soon as possible after the protective order was issued. Furthermore, Bookspan does not believe that any party will be prejudiced by this delay.

Respectfully submitted,

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