

# DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

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POSTAL RATE COMMISSION  
OF Docket No. R97-1

**UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF  
RESPONSES OF WITNESS SMITH TO INTERROGATORIES OF ABA & EEI & NAPM  
(November 25, 1997)**

The United States Postal Service hereby moves for late acceptance of the responses of witness Marc Smith to the following interrogatories of American Bankers Association, Edison Electric Institute & National Association of Presort Mailers, dated November 14, 1997: ABA&EEI&NAPM/USPS-ST45-1 through 4.

These responses were due to have been filed by November 21, 1997. Unfortunately, witness Smith was disabled by a bout with the flu for several days last week. Upon his return, he focussed his attention on the preparation and filing of errata to USPS-LR-H-106 and H-111, which underlie his supplemental testimonies, USPS-ST-45 and USPS-ST-46. Those errata were filed on November 20 and 21, 1997. Witness Smith was not able to turn his attention to the preparation of interrogatory responses in time to complete them by the 21st, when they were due. Responses were finalized yesterday evening and have been filed today.

The Postal Service regrets this delay, but considers that it was unavoidable under the circumstances. To mitigate any prejudice which may have resulted, the Postal Service has sent a facsimile copy of the responses to counsel for NAPM today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

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November 25, 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.



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November 25, 1997