

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

RATE AND SERVICE CHANGES TO IMPLEMENT
FUNCTIONALLY EQUIVALENT NEGOTIATED
SERVICE AGREEMENT WITH BANK ONE
CORPORATION

Docket No. MC2004-3

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF THE UNITED STATES
POSTAL SERVICE WITNESS PLUNKETT TO INTERROGATORY OF THE OFFICE
OF THE CONSUMER ADVOCATE (OCA/USPS-T1-50)

The United States Postal Service hereby moves that the response of witness Plunkett to the following follow-up interrogatory of the Office of Consumer Advocate: OCA/USPS-T1-50, filed on August 16, 2004 and originally due on August 26, 2004, be accepted 4 business days late. As noted in the August 19, 2004 Report of the Settlement Coordinator, the preparation of the response to OCA/USPS-50 required a revision to witness Plunkett's response to OCA/USPS-T1-44, which is being provided today. For this reason, the Office of Consumer Advocate did not oppose the late filing of the response to Interrogatory 50. The undersigned counsel does not believe that any party will be prejudiced by this delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 1, 2004

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.

Nan K. McKenzie

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September 1, 2004