

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF  
RESPONSES TO UPS INTERROGATORIES,  
UPS/USPS-T5-70, 71(B), 72(B), 73-80, 84-86, and NOTICE OF FILING THOSE  
RESPONSES UNDER PROTECTIVE CONDITIONS  
(April 14, 2000)

The United States Postal Service hereby moves for late acceptance of interrogatories UPS/USPS-70, 71(B), 72(B), 73-80, 84-86, filed under seal by United Parcel Service (UPS) on March 23, 2000. UPS has been advised repeatedly that these responses (and others) would be filed late because of the crush of interrogatories propounded to witness Hunter at the close of the discovery period. The Postal Service does not understand that any party is prejudiced by the late filing.

These interrogatories were filed under seal. These responses are accordingly being filed under protective conditions pursuant to Presiding Officer's Ruling R2000-1/20..

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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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.

*K N Hollies*

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Kenneth N. Hollies

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April 21, 2000