

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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Docket No. MC2000-2

MOTION OF UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF INTERROGATORY RESPONSES
(January 11, 2000)

Responses to interrogatories OCA/USPS-T3-2-34 (as corrected), filed December 29, 1999, were due, but not filed, on January 10, 2000. The United States Postal Service hereby moves for acceptance of these responses one business day late.

The responses are being filed one day late because of their length, the fact they were filed on the last day of discovery, the press of filing other interrogatories filed on the same date, the need to discuss the responses with necessary personnel, the departure from Postal Service employment of the lead witness in Docket No. MC2000-2, the transition to a new witness, and the fact that the Postal Service lead counsel was out of the office for medical reasons on January 6 and 7.

WHEREFORE, the United States Postal Service hereby moves for late acceptance of its responses to interrogatories OCA/USPS-T3-2-34.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
January 11, 2000