

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 THE
NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO
FOR AN ORDER AUTHORIZING LATE FILING
OF ITS NOTICE OF INTERVENTION
(February 17, 2000)

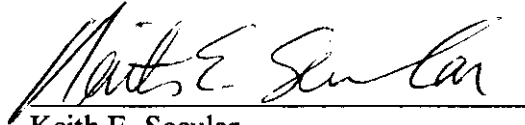
In accordance with section 19(c) of the rules of practice, the National Association of Letter Carriers, AFL-CIO ("NALC") hereby moves for an order authorizing the late filing of its notice of intervention, which is submitted herewith. In support of its motion, NALC submits the following.

On February 16, 2000, the undersigned appeared for NALC at the prehearing conference and learned, for the first time, that NALC's notice of intervention had not been received by the Commission. The notice had been prepared by our office on February 11, 2000, and copies were served, by first class mail, upon all participants of record on that date. However, due to an apparent clerical error, the copies of the notice that were to have been filed with the Commission were never mailed.

Acceptance of NALC's filing will not delay these proceedings. Moreover, there is no conceivable prejudice to any party, particularly since the parties were served in a timely manner. (Counsel for the United States Postal Service has confirmed that the Service did receive NALC's notice.)

NALC respectfully submits that, in light of its substantial interest in the outcome of this proceeding (set forth in the notice of intervention), the foregoing facts establish good cause for an order authorizing the late filing of its notice of intervention. NALC's motion should be granted.

Respectfully submitted,

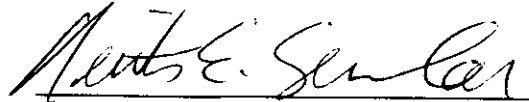
A handwritten signature in black ink, appearing to read "Keith E. Secular", is written over a horizontal line.

Keith E. Secular
Cohen, Weiss & Simon LLP
330 West 42nd Street
New York, NY 10036
(212) 563-4100

Counsel for National Association of
Letter Carriers, AFL-CIO

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding.


Keith E. Secular

Dated: Washington, D.C.
February 17, 2000