

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 UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF RESPONSES OF WITNESSES BARON AND
RAYMOND TO UPS INTERROGATORIES
(UPS/USPS-T12-1, UPS/USPS-T13-6)**

From Tuesday, February 22, until Thursday, February 24, 2000, the Law Department of the United States Postal Service experienced significant periods of computer network downtime. Since the postal ratemaking litigation function is significantly computer-dependent, this loss of capacity severely and unavoidably impaired the ability of undersigned counsel to meet the filing deadlines for two interrogatory responses, specifically the responses to UPS/USPS-T12-1 (witness Baron) and UPS/USPS-T13-6 (witness Raymond). The responses are being filed today, one day late. Given the circumstances, the Postal Service has no choice but to

request leave to file the responses one day out of time, a request it hereby respectfully makes.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

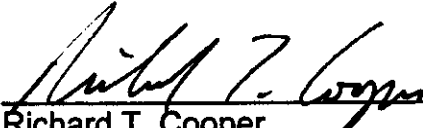
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
February 25, 2000