

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 RESPONSE TO
OFFICE OF THE CONSUMER ADVOCATE INTERROGATORY
(OCA/USPS-54)

The United States Postal Service hereby moves that it be permitted to file six calendar days late its response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-54 (filed on February 8, 2000).

The response was due to have been filed on Tuesday, February 22nd. A diligent search for responsive records was initiated upon receipt of the interrogatory, but the search was not completed until the morning of Friday, February 25th. On that date, a response and a motion for late acceptance were prepared for filing. However, in response to a call from OCA counsel late on the afternoon of the 25th suggesting that the Postal Service had misnumbered other interrogatories in the same set (OCA/USPS-53 through 56) when it filed responses to OCA/USPS-53 and 55 on February 24th, the Postal Service withheld the filing of its response to OCA/USPS-54 (and the motion for late acceptance) in order to investigate the alleged mis-numbering of interrogatories. Unfortunately, the basis for the OCA's concern did not make itself apparent in the course of undersigned counsel's review of filed documents relating to interrogatories OCA/USPS-53 through 56. So, the response to OCA/USPS-54 is being filed today.

The Postal Service considers that the six-day delay in the filing of its response to OCA/USPS-54 will not prejudice any participant in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:
Daniel J. Foucheaux, Jr.

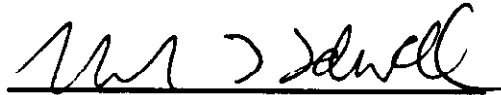
Chief Counsel, Ratemaking



Michael T. Tidwell

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.



Michael T. Tidwell

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February 28, 2000