

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  
OBJECTION TO INTERROGATORY DFC/USPS-26 OF DOUGLAS F. CARLSON  
(February 28, 2000)


The United States Postal Service hereby moves for late acceptance of its objection to interrogatory DFC/USPS-26 of Douglas F. Carlson, filed on February 11, 2000, 6 days, and 4 business days, late. Because of the press of other rate case discovery, and the need to consult with other organizations within the Postal Service, a determination to object could not be reached until the answer was due.<sup>1</sup> The full nature of the extent and objectional nature of the request in DFC/USPS-26 for reports in various areas was not clear until today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

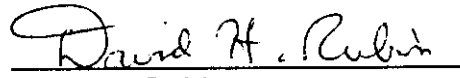
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<sup>1</sup> There was effort much earlier to obtain the index of Inspector General and Inspection Service audits, as requested in DFC/USPS-25, but the request in DFC/USPS-26 to identify particular reports generally awaited access to these indices.

**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.

  
David H. Rubin

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Washington, DC 20260-1137  
February 28, 2000