

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 OF WITNESS CAMPBELL
TO KEYSpan ENERGY INTERROGATORY KE/USPS-T29-18(b)

The United States Postal Service hereby moves that it be permitted to file three calendar days late the response of witness Campbell to the following interrogatory of KeySpan Energy: KE/USPS-T29-18(b), filed on February 14, 2000.

This interrogatory was part of a set of questions which included nearly ninety subparts. Because of the volume of questions in that set and other interrogatories he was responsible for answering this week, witness Campbell was unable until today, to complete a answer to T29-18(b). The Postal Service considers that the three-day delay in response will not prejudice any party.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

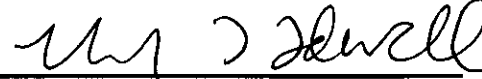
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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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March 2, 2000