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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR LATE ACCEPTANCE OF RESPONSES TO INTERROGATORIES OF  
ASSOCIATION OF ALTERNATIVE POSTAL SYSTEMS  
(March 14, 2000)

The United States Postal Service hereby moves for late acceptance of the filing of responses to the following interrogatories directed by Association of Alternative Postal Systems to witness Mayes on February 23, 2000: AAPS/USPS-T32-1 and T32-4 through T32-12. Objections to AAPS/USPS-T32-2 and 3 were filed on March 4, 2000. Witness Mayes has responded to T32-1, T32-4 through 10, 11(d) and 12. She redirected T32-11(a)-(c) to the Postal Service for response. All responses were filed today.

The responses were due to have been filed on Wednesday, March 8th, four working days (six calendar days) ago. It appears that undersigned counsel may have misread the filing date on the interrogatories and communicated an erroneous due date to witness Mayes, resulting in both of the witness and counsel focusing on other Docket No. R2000-1 matters and not scheduling time for the preparation of responses to the AAPS interrogatories as the actual due date drew near. The error was discovered on the due date (March 8<sup>th</sup>) and witness Mayes has working diligently since then to either prepare responses or have them prepared. Undersigned counsel was out of town last week from Thursday afternoon until Friday afternoon (March 9<sup>th</sup> -10<sup>th</sup>), in connection

with discovery related to another witness, and was unable to review any draft responses and consult with witness Mayes until yesterday. As a consequence, her responses to AAPS/USPS-T32-1, T32-4 through T32-10 and T32-12 (and the response of the Postal Service to T32-11) could not be filed until today.

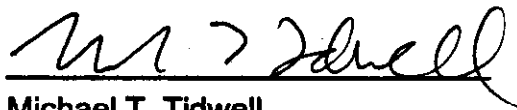
The Postal Service regrets the delay in the filing of responses to these interrogatories caused by this apparent oversight, but believes that no party has been prejudiced.

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 14, 2000