

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

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POSTAL RATE COMMISSION
OFFICE OF GENERAL COUNSEL

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA
(MPA/USPS-T14-1-2)
(March 16, 2000)

The United States Postal Service hereby moves for late acceptance of the following interrogatories of Magazine Publishers of America directed to witness Kashani: MPA/USPS-T14-1-2, filed on February 15, 2000.

The interrogatories were due on February 29, 2000. The responses are thus twelve working days late. The lateness was caused by a number of factors. First, the responses did involve quite a bit of effort. Second and most importantly, in working on the responses, a distribution key error was discovered. The mechanics and consultation with other functional groups at Headquarters required to accurately estimate and assess the impact of correcting the error took some time. Third, the press of handling the myriad other details of the case resulted in these particular responses getting lost in the shuffle. Finally, witness Kashani recently has been out sick. The Postal Service regrets any inconvenience.

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Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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.



Susan M. Duchek

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March 16, 2000