

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

RECEIVED

MAR 16 4 47 PM '00

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
MAJOR MAILERS ASSOCIATION INTERROGATORY (MMA/USPS-1)
(March 13, 2000)

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 Major Mailers Association: MMA/USPS-1, filed on February 25, 2000. The response was due to have been filed on March 10, 2000.

Preparation of the answers to the various subparts of this interrogatory required a search for and review of responsive documents and consultations with personnel concerning the numerous Move Update and Address Information Service products referred to therein. These consultations took longer to complete than expected. The extensive travel schedules of certain knowledgeable personnel (who are not connected to the rate case) limited the opportunity to expeditiously confer with them concerning numerous matters related to the documents referred to in the interrogatory. Those consultations were completed today. The Postal Service regrets missing the discovery response deadline by six days, but assures the Commission and MMA that every effort was made to prepare accurate responses as quickly as possible. The Postal Service does not believe that any party will be prejudiced by the delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998 Fax -5402
March 16, 2000

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998 Fax -5402
March 16, 2000