

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

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF RESPONSES TO INTERROGATORIES OF
KEYSPAN ENERGY**

The United States Postal Service hereby moves for late acceptance of its responses to the following interrogatories of KeySpan Energy: KE/USPS-T33-2(e), 9(g), 10(d), 21(a-c) and 22(c). The interrogatories were filed on February 10, 2000. These responses were due to have been filed on February 24, 2000. They are 25 calendar days late. Preparation of the responses required extensive consultation with components of postal management not directly involved in rate litigation, as well as consultations with field personnel directly involved in mail processing and observations of mail processing. Delay also has resulted from time-consuming, but apparently successful, efforts to informally resolve a related discovery dispute between KeySpan and the Postal Service.

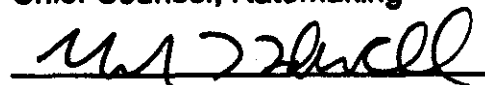
Given the nature of the information provided in its late responses, the Postal Service considers that no party will be prejudiced by the length of time it took the prepare these responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Michael T. Tidwell

March 20, 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.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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March 20, 2000