

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 RESPONSE TO
INTERROGATORY OCA/USPS-52
(March 20, 2000)

The United States Postal Service hereby moves that it be permitted to file thirty eight calendar days late its response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-52, filed on January 28, 2000.

The response was due to have been filed on Friday, February 11, 2000. Preparation of the response required extensive consultation with various components of postal management at Headquarters and their subordinate field units to determine if any responsible personnel could shed light on the relatively rare practice of distributing postage stamps to recipients at no charge and to determine if records relating to any such transactions since 1995 could be located. With the exception of one specific documented instance, the information provided in response to the interrogatory summarizes the collective recollections of numerous personnel who were contacted during the search for responsive information and records. The extraordinary time taken to respond to OCA/USPS-52 is a consequence of trying to balance all of the competing burdens associated with omnibus rate case discovery, while diligently searching the proverbial postal "haystack" for this particular "needle."

The substance of OCA/USPS-52 does not relate to any aspect of the Postal Service's request in this proceeding. At best, it is only tangentially related to a proposal the Postal Service anticipates will be filed by the OCA at an appropriate later stage in

the case. Accordingly, the Postal Service does not consider that any party is prejudiced by the extraordinary length of time it took to locate responsive information and to reach the conclusion that other records were unlikely to be located.

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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