

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

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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 OF
WITNESS KINGSLEY TO INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE,
REDIRECTED FROM WITNESS YACOBUCCI
(PostCOM/USPS-T25-4(a-d, g-i))

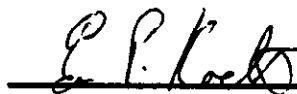
The United States Postal Service hereby moves for late acceptance of the response of witness Kingsley to PostCom/USPS-T25-4(a-d, g-i), filed on March 8, 2000, and redirected from witness Yacobucci. The one-day delay in filing was caused by the need to consult with Engineering personnel who were on official travel earlier this week, but who were able to improve the precision of the answer materially relative to the preliminary response prepared in their absence. Therefore, not only is there no prejudice from the one-day delay, but all participants actually gain the benefit of a better answer.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992 Fax -5402
March 23, 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.



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992 Fax -5402
March 23, 2000