

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 FOR LATE ACCEPTANCE OF  
OPPOSITION OF UNITED STATES POSTAL SERVICE  
TO UPS MOTION TO COMPEL PRODUCTION OF INFORMATION AND  
DOCUMENTS REQUESTED IN INTERROGATORY UPS/USPS-T34-11  
TO WITNESS ROBINSON  
(March 24, 2000)

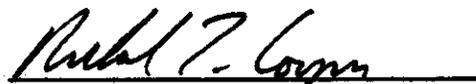
The United States Postal Service hereby requests leave to file late its response to the UPS Motion To Compel Production of Information And Documents Requested in Interrogatory UPS/USPS-T34-11, filed on March 13, 2000. Although the cause is unclear, hardcopy of this motion did not reach Postal Service counsel until after the deadline for response had already elapsed. Furthermore, the administrative mechanisms designed to track incoming web postings failed to track this document. The Postal Service has thus prepared its response in as rapid a manner as possible and asks that it's response be considered before any ruling on the UPS Motion is issued. The Postal Service regrets any inconvenience that this oversight may have caused.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

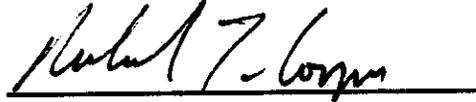


Richard T. Cooper

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Washington, D.C. 20260-1137  
(202) 268-2993; Fax -5402  
March 24, 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 "Richard T. Cooper", is written over a horizontal line.

Richard T. Cooper

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March 24, 2000