

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 ITS OBJECTIONS
TO OCA INTERROGATORIES OCA/USPS-T39-10 AND 12
TO WITNESS MAYO
(March 29, 2000)

The United States Postal Service hereby moves for late acceptance of its objections to OCA interrogatories OCA/USPS-T39-10 and 12, filed on March 16, 2000, and directed to witness Mayo. The objections would otherwise have been due two days ago, March 27, 2000.

The objection to number 10 is only partial, and an answer will be filed which provides much of the information requested. The need for an objection was not determined earlier, however, because of the posture of the question. By filing a follow-up interrogatory to a witness (Mayo) other than the witness (Kay) associated with the material which prompted the follow-up, the OCA (no doubt inadvertently) caused a communication gap which was not rectified until after the time period for objections had passed. With respect to number 12, the delay was caused by absences due to the Postal Forum of individuals within functional organizations not directly involved with the rate case, and their subsequent failure to appreciate the different deadlines for

responses and objections.

Respectfully submitted,

UNITED STATES POSTAL SERVICE


By its attorney:



Eric P. Koetting

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

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