

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

RECEIVED

APR 6 4 53 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO ADVO INTERROGATORY ADVO/USPS-7 AND
MOTION FOR LATE ACCEPTANCE

The United States Postal Service hereby moves for late acceptance of the following objection to ADVO/USPS-7. The objection should have been filed on April 3rd. The interrogatory seeks information from the delivery redesign program, and the delay in filing this objection was due to the already massive workload in that area, and the need to develop an estimate of the burden involved to respond.

ADVO/USPS-7 seeks any information indicating the effect of weight on city carrier operations. The Postal Service objects on the grounds of undue burden. The potentially relevant information from the delivery redesign program is stored in a number of cardboard boxes. The Postal Service estimates that it would require two to three days of dedicated effort merely to segregate potentially relevant information. Under the circumstances in which the same personnel who would have to undertake this effort are already more than fully occupied in addressing other matters raised by

ADVO and other intervenors, this effort would be undue.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:


Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993 Fax -5402
April 6, 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.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993 Fax -5402
April 6, 2000