

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 RESPONSES INTERROGATORIES OF KEYSpan ENERGY

The United States Postal Service hereby moves that it be permitted to file today, seven calendar days late, the responses of witness Campbell to the following interrogatories of KeySpan Energy: KE/USPS-T29-33, 34(a,b,d-g), 35(b,c), 38, 39(c), 42, 44, 45 and 48. The Postal Service also hereby moves that it be permitted to file seven calendar days late its response to the following interrogatory of KeySpan Energy: KE/USPS-T29-43, redirected from witness Campbell. These interrogatories were filed on March 16, 2000. The responses were due to have ben filed on March 30, 2000.

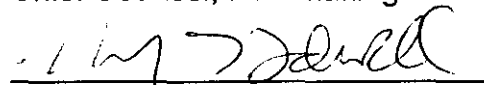
These interrogatories were part of a set of 24, many of which have several subparts and which are interrelated. The preparation of responses has been a considerable undertaking, and is not yet complete. To minimize any prejudice to the requesting party caused by a delay in responding, the Postal Service has filed those portions of responses to each interrogatory which have been completed to-date.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking




Michael T. Tidwell

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.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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April 6, 2000