

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 UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF  
INTERROGATORY RESPONSES, UPS/USPS-T5-58-66 AND NOTICE OF FILING  
INTERROGATORY RESPONSES UNDER PROTECTIVE CONDITIONS  
(April 7, 2000)

The United States Postal Service hereby moves for late acceptance of witness Hunter's responses to interrogatories UPS/USPS-T5-58-66, filed on March 23, 2000. These interrogatories are the first to be filed by witness Hunter from those filed by UPS on the last day of discovery (March 23), which included UPS/USPS-T5-58-87. (Responses redirected to witness Pafford were filed without protective conditions on April 6, 2000.) The Postal Service understands that no party is prejudiced by the late filing of these responses; UPS in particular was advised by the undersigned counsel shortly after their filing that there was little likelihood these responses could be timely filed because of the vast numbers of interrogatories requiring extensive investigation that were directed to witness Hunter at the close of the discovery period. Moreover, NNA yesterday filed a motion requesting, among other things, the opportunity to recall witness Hunter to the stand in connection with NNA's motion to compel responses to interrogatories that also have yet to be fully investigated. Should he be recalled, UPS will be able to inquire at that time about any interrogatory responses filed hereafter.

The Postal Service also hereby gives notice that the interrogatory responses whose late acceptance are sought by this pleading are being filed under protective conditions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

K N Hollis  
Kenneth N. Hollies

#### 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.

K N Hollis  
Kenneth N. Hollies

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April 7, 2000