

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  
OBJECTIONS TO UPS INTERROGATORY UPS/USPS-T34-34  
TO WITNESS ROBINSON

The United States Postal Service hereby requests leave to file four days late objections to interrogatory UPS/USPS-T34-34, filed on March 22, 2000. Due to the volume of incoming discovery requests, and the amount of time needed to locate potentially responsive documents, it was not possible to formulate objections to these questions until today. Furthermore, the recent involvement of undersigned counsel in preparations and conduct of a technical conference pursuant to Presiding Officer's Ruling No. R2000-1/27 significantly delayed review of the interrogatory and potential objections. The Postal Service has emailed the objections to counsel for UPS, and does not believe that the short, yet unavoidable delay, will work to the unfair advantage of any party.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
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Richard T. Cooper

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April 7, 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

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