

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 OF WITNESS CAMPBELL TO INTERROGATORIES OF
KEYSPAN ENERGY

The United States Postal Service hereby moves that it be permitted to file three calendar days late the responses of witness Campbell to the following interrogatories of KeySpan Energy: KE/USPS-T39-8(a,b,d,e), 10(i) and 11(b-e)

The interrogatories were filed on March 20, 2000; the responses were due to have been filed on April 4, 2000. The burden of preparing numerous other interrogatory responses, which were filed yesterday, made it impossible for witness Campbell to also prepare timely responses to the questions which had been redirected to him from witness Mayo. The Postal Service regrets the delay, but believes hat no party will be prejudiced by it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

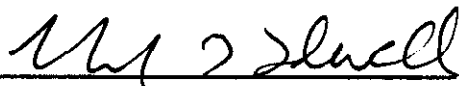


Michael T. Tidwell

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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.


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April 7, 2000