

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

**UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF
RESPONSE TO INTERROGATORY NAA/USPS-2(B-D)**

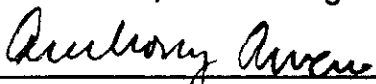
On March 23, 2000, the last day of discovery on the Postal Service's case-in-chief, NAA filed interrogatories NAA/USPS—1-10. The Postal Service filed timely answers to interrogatories 1, 2(a), and 3-10 on April 6, 2000. The Postal Service respectfully requests that its response to interrogatory 2(b-d) be received four days out of time due to the need to seek input and review from multiple persons in Headquarters offices about the subject matter of subparts (b-d), and also due to the discovery burdens imposed on persons involved in preparing the response in the last remaining days of discovery on the Postal Service's case-in-chief.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Anthony Alverno
Attorney

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.



Anthony Alverno

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April 10, 2000