

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001 RECEIVED

POSTAL RATE AND FEE CHANGES, 2000

APR 11 4 36 PM '00
Docket No. R2000-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE RESPONSES TO INTERROGATORIES
OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-75-80)

The United States Postal Service hereby moves that it be permitted to file 22 calendar days late its responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-75 through 80, filed on March 6, 2000.

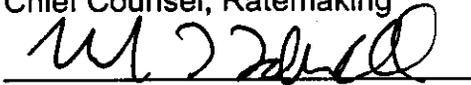
The responses were due to have been filed on March 20, 2000. The search for responsive information required that the questions be disseminated to numerous components of postal management at Headquarters and elsewhere. Some were more quick to respond than others. A number of the interrogatory subparts are interrelated, which required extensive consultations among interested management components. A considerable portion of the tardiness of the responses can be attributed to the effort undertaken to confirm whether any information responsive to several interrogatory subparts existed. A final contributing factor has been the press of other discovery obligations. The Postal Service regrets the delay in responding, and ultimately defers to the OCA on the question of whether the delay has been prejudicial.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 11, 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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