

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 FOR LATE ACCEPTANCE OF
RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO ADVO INTERROGATORY
(ADVO/USPS-T13-23(b))
(April 11, 2000)

The United States Postal Service hereby moves for acceptance of the response of witness Raymond to the following interrogatory of Advo, Inc. five weeks late: ADVO/USPS-T13-23(b), filed on February 22, 2000. Several factors contributed to the delay in providing this response. First, witness Raymond, to whom the interrogatory was initially directed, has been the target of hundreds of interrogatories in recent weeks, and has also been needed to assist in formulating responses to a number of procedural challenges related to certain of his interrogatory responses, as well as to facilitate and conduct a special technical conference pursuant to Presiding Officer's Ruling No. R2000-1/27. Second, in the course of preparing a response to this highly technical interrogatory, it became apparent that the most efficient means to provide a responsive answer would be to enlist the aid and review of a number of other statistically proficient individuals, including witness Baron. Unfortunately, these individuals were also deeply involved in responding to discovery matters, delaying their full participation, and slowing coordination of efforts. Finally, the high volume of discovery requests during this period prevented counsel from immediately reviewing the answers under development.

An electronic version of this response was sent by email today to counsel for
Advo, Inc.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

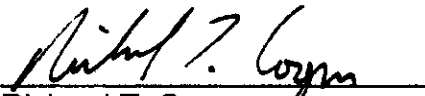
Daniel J. Foucheaux, Jr.
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Richard T. Cooper

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April 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.


Richard T. Cooper

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April 11, 2000