

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

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POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF OBJECTION TO
POSTCOM INTERROGATORIES
(POSTCOM/USPS- 6(a,b) AND 7(a,b))

The United States Postal Service hereby moves that it be permitted to file eight calendar days late its objection to the following interrogatories of PostCom: PostCom/USPS-6(a,b) and 7(a,b).

The objections were due to have been filed on April 3, 2000. Unfortunately, the postal manager most knowledgeable about the subject matter of these interrogatories is recuperating from treatment for a life-threatening medical condition and his responsibilities have been split by other capable managers who are less familiar with the details of the subject matter of these interrogatories. Assuming at first that responsive records might be in the possession of the Postal Service, they conducted an internal search (which turned up no records) before conferring with the consulting firm¹ that prepared the underlying reports to which the interrogatories refer. That contact resulted in a search which, yesterday, located records which provide the basis for the responses to various subparts of PostCom/USPS-5 through 8, which were filed today.

Consultations with appropriate managers has led to the determination concerning the burden associated with responding to subparts (a) and (b) of

¹ Which is not presently under contract to perform additional tasks associated with those reports.

interrogatories 6 and 7. Under these circumstances, notice of the basis for the objection has been provided as expeditiously as circumstances permitted.

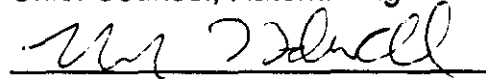
Under these circumstances, the Postal Service does not believe that PostCom has been prejudiced by the delay in the filing of the objection.

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.



Michael T. Tidwell

April 11, 2000