

DOCKET SECTION

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 INTERROGATORIES OF KEYSpan ENERGY**

The United States Postal Service hereby moves that it be permitted to file 16 calendar days late the responses of witness Campbell to the following interrogatories of KeySpan Energy: KE/USPS-T29-34(c), 35(a), 46 and 47, which were filed on March 15, 2000. The Postal Service also moves that it be permitted to file 10 calendar days late the response of witness Campbell to KE/USPS-T29-49, which was filed on March 21, 2000.

The first group of questions was part of a set of 24 interrogatories filed together, many of which have several subparts and which are interrelated. The preparation of responses has been a considerable undertaking. To minimize any prejudice to the requesting party caused by a delay in responding, the Postal Service has filed responses to independent subparts of interrogatories as they were completed.

Preparation of the response to T29-49 has required the collection of data concerning 75 specific QBRM recipients and development of a cross-walk to show the accounting methods employed at the sites where their mail is received. Presentation of the requested information in a manner which does not identify specific customers or postal facilities, but which ensures the reader's ability to follow data pertaining to particular (unidentified) customers and facilities has been a laborious process, and has contributed to the tardiness of these and other responses.

In addition, witness Campbell made an extraordinary effort to attempt to be as responsive as possible to T29-49 before determining the full extent of the burden of producing all of the requested information. In view of the degree to which witness

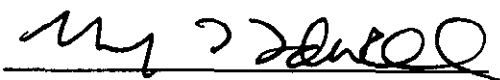
Campbell has attempted to be responsive to this particular interrogatory before reporting the full extent of the burden imposed, the Postal Service does not believe that any party is prejudiced by the delay in the filing of the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

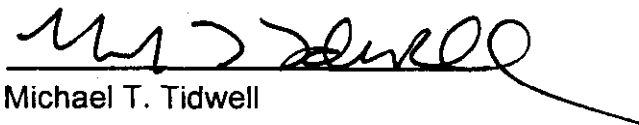


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April 14, 2000

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 14, 2000