

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 OF WITNESS MAYES  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(UPS/USPS-T32-12 AND 13)

The United States Postal Service hereby moves that it be permitted to file today, 26 calendar days late, the responses of witness Mayes to the following interrogatories of United Parcel Service: UPS/USPS-T32-12 and 13 (filed on March 8, 2000).

The responses to these two interrogatories were due to have been filed on March 22, 2000. Preparation of these responses has been dependent upon the completion and review of errata to the testimony of witness Plunkett (USPS-T-36). Those errata were only recently completed and submitted to witness Mayes for review, and are being filed today. Accordingly, witness Mayes is finally able to provide responses to UPS/USPS-T32-12 and 13. The Postal Service regrets the delay in responding to these interrogatories, and defers to UPS on the question of whether it has resulted in any prejudice.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.

Chief Counsel, Ratemaking

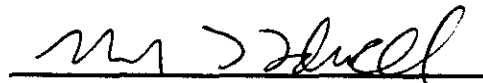


Michael T. Tidwell

April 17, 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 "M. Tidwell", is written above a horizontal line.

Michael T. Tidwell

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April 17, 2000