

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 CAMPBELL
TO KEYSpan INTERROGATORY
(April 19, 2000)

The United States Postal Service hereby moves that it be permitted to file 21 calendar days late the response of witness Campbell to the following interrogatory of KeySpan Energy: KE/USPS-T29-31.

These interrogatories were part of a set of approximately 100 questions filed as subparts of interrogatories KE/USPS-T29-24 through 47 on March 15, 2000. The responses were due to have been filed on March 29th.

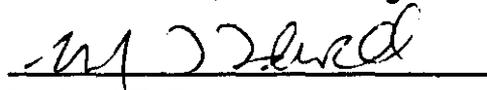
This particular interrogatory required that witness Campbell locate and review notes of sites visits which occurred last year, while trying to respond to the other aforementioned interrogatories. While witness Campbell worked diligently to respond to all of the interrogatories as expeditiously as possible, it was deemed most efficient to prepare responses to other questions before turning his attention to KE/USPS-T29-31. Hence, the delay. Given the substance of the response, the Postal Service considers that no party will be prejudiced by the filing of the responses three weeks late.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

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

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April 19, 2000