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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR LATE ACCEPTANCE OF  
CRPA MOTION TO COMPEL RESPONSES INTERROGATORY T32-8 and 10(c)  
(April 19, 2000)

The United States Postal Service hereby moves that it be permitted to file one calendar day late its response to the March 11, 2000, Motion to Compel filed by Coalition of Religious Press Associations.

The response was due to have been filed yesterday by undersigned counsel, who was in the Commission hearing room representing Postal Service witness Miller yesterday. At 3:40p.m. yesterday, undersigned counsel received a telephone message in the hearing room from his office indicating that he had received messages from an intervenor counsel<sup>1</sup> whom he had asked to comment on a draft of the Postal Service's response to the CRPA Motion that undersigned counsel had prepared for filing yesterday. Unsure whether further communication with the intervenor attorney might prompt a change in what had been prepared for filing and considering it imprudent to disrupt the cross-examination of Postal Service witness Miller to find out, undersigned counsel sent a message back to his office instructing that the prepared response not be filed. Having since had a chance to respond to the communications from the

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<sup>1</sup> The office of this particular intervenor counsel was within the security perimeter established by the District of Columbia Metropolitan Police Department in connection with the World Bank/International Monetary Fund meetings and was closed on Monday, April 17<sup>th</sup>, making it impossible for that attorney to respond to communications from postal counsel on that date until the next day.


aforementioned intervenor, postal counsel is able to submit the Postal Service's response to the CRPA motion today. The Postal Service considers that no party will be prejudiced by this delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

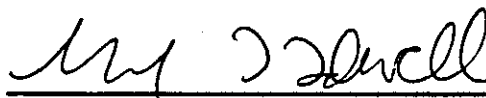


Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998 Fax -5402  
April 19, 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 19, 2000