

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 INTERROGATORIES
(April 20, 2000)

The United States Postal Service hereby moves that it be permitted to file numerous days late the responses of witness Campbell to the following interrogatories of KeySpan Energy: KE/USPS-T29-9(h), 21(d), 34(h) and 52(e).

T29-9(h)

The response to this interrogatory was due to have been filed on February 24, 2000. Preparation of this response depended on the development of the response to subpart (g), which was filed late on March 24, 2000. Witness Campbell's review of filed responses revealed that no response to subpart (h) had since been prepared. Accordingly, a response was prepared for filing today. The Postal Service apologizes for the oversight.

T29-21(d)

This response was due to have been filed on February 24, 2000, but was dependent upon an answer to subpart (a), which was not filed until March 24, 2000. The failure to file a response on that date was an oversight, but an inconsequential one, since the answer filed today merely indicates that there is no need to answer subpart (d), in light of the institutional response to subpart (a), originally filed on March 20, 2000, but adopted by witness Campbell today.

T29-34(h)

This response was due to have been filed on March 29, 2000. The response was delayed by witness Campbell's attempt to determine whether he had retained any contemporaneous notes pertaining to site visits which might have recorded the basis for the assumption that 100 percent of QBRM pieces flow from the MMP operation to the SCF primary operation. Completion of the search was delayed by his efforts to respond to other outstanding interrogatories.

T29-52(e)

This response was due to have been filed on April 6, 2000. The delay in responding is attributable to the fact that the question is well beyond the scope of witness Campbell's testimony and that the search for responsive information took him longer than it might have taken some other witness whose testimony bore some relationship to the subject matter of the question.

The Postal Service apologizes for the delay in responding to these various interrogatory subparts, but believes that no party has been prejudiced.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 20, 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.



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April 20, 2000