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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 OBJECTION  
TO INTERROGATORY OF UNITED PARCEL SERVICE  
(April 21, 2000)

The United States Postal Service hereby moves that it be permitted to file one calendar day late its objection to the following interrogatory of United Parcel Service: UPS/USPS-T34-10(e).

A draft objection had been prepared by co-counsel in an electronic document, which was to be printed and filed at the Commission yesterday. Co-counsel left the office at mid-day to work on other rate case related matters from a postal facility in Northern Virginia and called to leave a message requesting that undersigned counsel review the document and prepare it for filing on his behalf. Unfortunately, undersigned counsel and others in the office could not locate the electronic document in the electronic file sub-directory where it was expected to be found (or any other Docket No. R2000-1 electronic file sub-directory) and could not reach co-counsel in Northern Virginia in time to unravel the mystery of the whereabouts of the document until too late in the day for it to be filed at the Commission.<sup>1</sup> Accordingly, the objection was not filed yesterday. Because no party would be prejudiced by a filing of the objection today, the Postal Service moves that it be permitted to do so.

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<sup>1</sup> It turns out that the document had inadvertently been saved in a sub-directory unrelated to any of the office's Docket No. R2000-1 files.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking




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April 21, 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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