

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 RESPONSE OF WITNESS CAMPBELL
TO KEYSpan ENERGY INTERROGATORY
(KE/USPS-T29-51(i))

The United States Postal Service hereby moves that it be permitted to file 18 calendar days late the response of witness Campbell to the following interrogatory of KeySpan Energy: KE/USPS-T29-51(i). The response was due to have been filed on April 6, 2000.

Witness Campbell responded to the other nine subparts of T29-51 on April 11, 2000. At that time, a response to subpart (i) was not ready to be filed. Since then, witness Campbell has worked diligently to prepare responses to other outstanding interrogatories and otherwise fulfill his responsibilities. In the course of preparing for cross-examination this weekend, he discovered that he had not yet completed the response to subpart (i) of T29-51 and alerted counsel. A response was prepared yesterday and is being filed today, thirteen days after responses to the other subparts of T29-51 were filed.

The Postal Service regrets this oversight, but believes that no party will be prejudiced by the delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

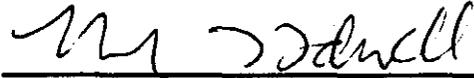


Michael T. Tidwell

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April 24, 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 24, 2000