Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

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Docket No. R2000-1

MOTION OF UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF RESPONSE OF TO INTERROGATORIES UPS/USPS-7-11, AND RESPONSES OF WITNESS ROBINSON TO QUESTIONS POSED AT HEARING

The United States Postal Service hereby moves for leave to respond late to United Parcel Service interrogatories UPS/USPS-7-11, filed on April 10, 2000, and to the responses of witness Robinson to questions posed during her cross-examination. These responses were due on April 24th and 25th, respectively. The need to coordinate the efforts needed to respond to these questions among a variety of individuals throughout Postal Service headquarters, together with the impact of the intervening religious holidays on personnel availability, slightly delayed these responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. (202) 268-2993; Fax: -5402 Washington, D.C. 20260-1137 April 26, 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.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 April 26, 2000