

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 UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF
OBJECTION TO INTERROGATORY UPS/USPS-T4-15
(April 27, 2000)

The United States Postal Service hereby moves for late acceptance of its objection to interrogatory UPS/USPS-T4-15, which was filed on April 11, 2000. This interrogatory was not brought to the attention of the witness to whom it was directed until the day on which a response was due, apparently a confluence of administrative inadvertence and crush of RPW-related work that has required close attention by counsel and RPW personnel. Consultation necessary to determine the appropriate response to the interrogatory took an additional two days, which was complicated by the need to include individuals involved during the work day in hearings at the Postal Rate Commission. Especially in light of the grounds for the objection, which include untimeliness and the fact that the interrogatory is not proper follow-up, the Postal Service believes no party is prejudiced by the late filing of the objection.

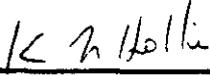
A copy of this pleading and the objection are being provided directly to counsel for UPS today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

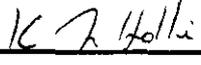
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

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.



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
April 27, 2000