

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 FOR LATE ACCEPTANCE OF
RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO ADVO AND UPS INTERROGATORIES
(ADVO/USPS-T13-24-37, 39-50, 52-59, UPS/USPS-T11-25)
(April 28, 2000)**

The United States Postal Service hereby moves for late acceptance of the responses of witness Raymond to the following interrogatories of Advo, Inc. and UPS: ADVO/USPS-T13-24-37, 39-50, 52-59, filed on March 15, 2000, UPS/USPS-T11-25, filed on March 23, 2000. Several factors contributed to the delay in providing these responses. First, witness Raymond has been the target of hundreds of interrogatories in recent weeks, and has also been needed to assist in formulating responses to a number of procedural challenges related to certain of his interrogatory responses, as well as to facilitate and conduct a special technical conference pursuant to Presiding Officer's Ruling No. R2000-1/27. Second, the assistance of other individuals, who are also involved in other aspects of this case, was needed to prepare and review the responses. Third, time was lost in the process of determining to redirect the UPS

interrogatory. Finally, the high volume of discovery requests during this period prevented counsel from immediately reviewing the answers under development.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

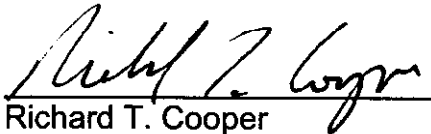
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April 28, 2000

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

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April 28, 2000