

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 RESPONSES TO INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA AND ADVO, INC.
(MPA/USPS-4-13, ADVO/USPS-4, ADVO/USPS-T13-51, 101, 103, 105-109)
(May 4, 2000)

The United States Postal Service hereby moves for late acceptance of responses to the following interrogatories of Magazine Publishers of America: MPA/USPS-4-13, filed on March 17, 2000, ADVO/USPS-4, filed on March 23, 2000, ADVO/USPS-T13-51, filed on March 15, 2000, and ADVO/USPS-T13-101, 103, 105-109 101, 103, 105-109, filed on March 23, 2000. These interrogatories, which focus on city carrier costs, including the Engineered Standards data used by witnesses Baron and Raymond, required the involvement of numerous individuals who have been fully occupied in developing responses to hundreds of interrogatories concerning these issues. Given the large number of interrogatories filed, and the need to simultaneously facilitate informal exchanges of information pursuant to Presiding Officer's Ruling No.

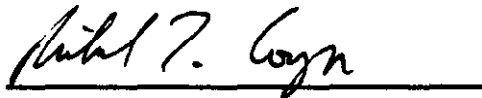
R2000-1, it was not possible for the responsible individuals and counsel to prepare and review these responses in such a way as to permit filing on any earlier date.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

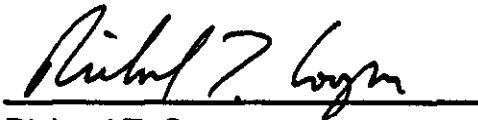


Richard T. Cooper

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May 4, 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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