

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 NNA/USPS-15
(May 8, 2000)

The United States Postal Service hereby moves for late acceptance of interrogatory NNA/USPS-15, filed April 21, 2000.

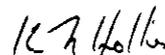
The basis for late acceptance is the volume of work required in the last week. Moreover, the undersigned counsel discussed this interrogatory with counsel for NNA to understand why the interrogatory was filed when it was, and with what expectation – especially since it appears to focus upon the 1971 to 1985 time period. Since NNA counsel was then made to understand that no responsive information was available and that the Postal Service intended to object to it as being late, the Postal Service has no expectation that the late filing will prejudice any party.

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

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May 8, 2000