

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

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OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR LATE ACCEPTANCE OF RESPONSE OF WITNESS RAYMOND  
TO ADVO INTERROGATORY 104  
(May 17, 2000)

The United States Postal Service hereby moves for late acceptance of the response of witness Raymond to the following interrogatory of Advo, Inc.: ADVO/USPS-T13-104, filed on March 23, 2000. Several factors contributed to the delay in providing this response. First, witness Raymond has been the target of hundreds of interrogatories in the discovery period, 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. Additionally, the high volume of discovery requests during this period prevented counsel from immediately reviewing the answers under development. Finally, Mr. Raymond recently was required to spend the bulk of two days at 1333 H Street for purposes of testifying before the Commission.

An electronic version of this response was sent by email today to counsel for Advo, Inc.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

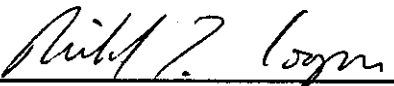
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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Washington, D.C. 20260-1137  
May 17, 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  
May 17, 2000