

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

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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 RESPONSES OF  
WITNESS RAYMOND TO ADVO INTERROGATORIES  
(ADVO/USPS-T13-137, 139)  
(May 24, 2000)

The United States Postal Service hereby moves for late acceptance of the responses of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-137, 139, filed on April 18, 2000. Several factors contributed to the delay in providing these responses. 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 these responses was sent by email today to counsel for  
Advo, Inc.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
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May 24, 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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May 24, 2000