

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 THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF ITS OPPOSITION
TO THE MOTION TO COMPEL A RESPONSE TO INTERROGATORY DFC/USPS-93

The United States Postal Service hereby moves for permission to file 10 calendar days late this opposition to the Motion of Mr. Carlson seeking to compel a response to DFC/USPS-93 (dated May 13, 2000; filed May 16, 2000).

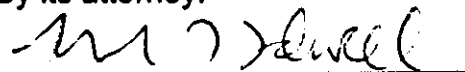
A review of the Postal Service's Docket No. R2000-1 files indicates that the Motion was received by the Postal Service on May 16th. Undersigned counsel has no recollection of whether a copy was distributed to him. Out of respect for the Law Department's very able support staff, it is presumed that a copy was distributed to undersigned counsel, but that it might have been discarded inadvertently before it was read. In any event, the existence of the Motion was brought to undersigned counsel's attention late yesterday afternoon and the preparation of an Opposition was undertaken immediately.

The Postal Service regrets the delay in the preparation and filing of its Opposition. However, the Postal Service considers that, under circumstances where the requester seeks the disputed information to serve as a foundation for argument to be made in his Initial Brief some months from now, the late filing of the Opposition to the Motion to Compel has resulted in no prejudice.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

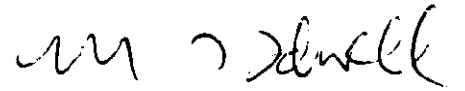


Michael T. Tidwell

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June 2, 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.



Michael T. Tidwell

June 2, 2000