

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
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 FILING OF  
DESIGNATION OF WRITTEN CROSS-EXAMINATION  
AND NOTICE OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION OF  
KEYSPAN ENERGY WITNESS BENTLEY  
(July 13, 2000)**

In accordance with Rule 30(e)(3) of the Rules of Practice and Procedure, the United States Postal Service was required to designate its written cross-examination and file its notice of intent to conduct oral cross-examination of KeySpan Energy witness Bentley yesterday. Undersigned counsel was unable to complete necessary consultations with responsible postal personnel regarding these matters before undertaking his commitment to represent the Postal Service in yesterday's hearings. Those hearing adjourned too late in the day for counsel to complete those consultations and file timely designations and a cross-examination notice. Accordingly, those pleadings could not be filed until today. The Postal Service regrets any inconvenience this delay may generate for the Commission, but believes that no party has been prejudiced.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this date 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

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July 13, 2000