

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

UNITED STATES POSTAL SERVICE
MOTION FOR LATE ACCEPTANCE OF PARTIAL OBJECTION TO
INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T28-20)

The United States Postal Service hereby moves that it be permitted to file today its partial objection to UPS/USPS-T28-20. The interrogatory was filed on November 7, 2001. The objection was due to have been filed on November 17th.

Copies of the responsive records were requested for review by counsel soon after the interrogatory was filed. Internal miscommunication apparently resulted in a delay in the collection of records responsive to the request, a delay which escaped counsel's attention because of the press of other matters in Docket Nos. R2001-1 and C2001-1. As of last week, only half of the requested records were in counsel's possession for review. It is expected that the other half will arrive on January 2, 2002. Based upon a review of the first half of the records, Postal Service postal counsel informed UPS counsel on December 27, 2001, of the substance of the objection filed today. The Postal Service regrets the delay in the filing of this objection.

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 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

475 L'Enfant Plaza West, S.W.
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December 31, 2001