

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF RESPONSES TO
INTERROGATORIES OF DOUGLAS CARLSON
(DFC/USPS-T28-2(a-c,e-h))

The United States Postal Service hereby moves for late acceptance of its responses to the following interrogatories of Douglas Carlson, filed on September 28, 2001: DFC/USPS-T28-2(a-c,e-h). The responses were due to have been filed on Friday, October 12, 2001. Headquarters personnel in the organizational unit formerly principally responsible for generating data responsive to subparts (b) and (c) of T28-2 are undergoing a Reduction-In-Force (RIF). Last week, the person in that unit who is most critical to the production of data and review of other information responsive to these interrogatories was hospitalized and/or convalescing at home as a result of physical ailments and was directed to cease work on discovery responses until such time as his health had improved sufficiently to return to work. Ignoring that directive, the employee has returned to work this week to generate the responsive data in order to minimize the delay in the response. Accordingly, the Postal Service is filing these responses today, six calendar days late.

The Postal Service regrets this delay, but considers that no prejudice will result to any party.

Accordingly, the Postal Service moves that its responses be accepted for filing today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 18, 2001

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice of the Postal Rate Commission, I have this day served the foregoing document upon all parties of record in Postal Rate Commission Docket No. R2001-1.

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