

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, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF PARTIAL OBJECTION OF  
THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OCA/USPS-T36-1(A) OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(October 22, 2001)

The United States Postal Service hereby moves for late acceptance of its partial objection to interrogatory OCA/USPS-T36-1(a), filed October 1, 2001. As discussed in its Notice of Review of Responses to Interrogatories DFC/USPS-1-2, filed October 12, 2001, the Postal Service discovered on October 12 that the response to those interrogatories was based on an incomplete list of Office of Inspector General audit reports.<sup>1</sup> That incomplete list was also used in responding to interrogatory OCA/USPS-T36-1(a). The partial objection to this interrogatory is being filed today, seven business days late, but as soon as possible after Postal Service counsel obtained the complete list, as well as potentially responsive reports, and completed a review of these reports and discussions with postal and OIG officials. Given that the discovery period has over

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<sup>1</sup>This possibility came to the attention of Postal Service counsel based on an email message from Douglas F. Carlson, received October 12, that identified an audit report of which Postal Service counsel was unaware. Further checking led to the determination that Postal Service counsel had an incomplete list of OIG audit reports.

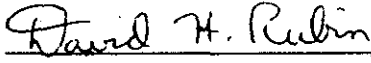
a month remaining, the Postal Service believes that other participants will not be prejudiced by this late objection.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

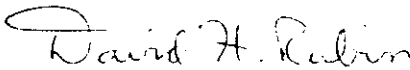
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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David H. Rubin

### 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.

  
\_\_\_\_\_  
David H. Rubin

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October 22, 2001