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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

EXPERIMENTAL SUSPENSION OF FEE FOR
MANUAL DELIVERY CONFIRMATION CATEGORY

Docket Nos. R2001-2
MC2001-2

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF
RESPONSES TO UNITED PARCEL SERVICE INTERROGATORIES
(October 22, 2001)**

Today, the Postal Service filed the responses of witness O'Hara to the following interrogatories of United Parcel Service: UPS/USPS-T1-26 through 34.

In accordance with Presiding Officer's Ruling R2001-2/MC2001-2/2 (October 12, 2001), the se responses were due to have been filed by noon today. Notwithstanding the due diligence of witness O'Hara, it was not possible to meet this deadline. Accordingly, the responses could not be filed until later this afternoon.

Copies of the responses have bene transmitted to UPS counsel by facsimile and e-mail. Accordingly, any prejudice resulting from the filing of these responses several hours late has been minimized. Accordingly, the Postal Service moves that the responses be accepted for filing this afternoon.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

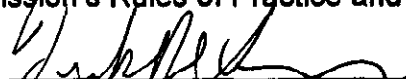
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Frank R. Heselton

CERTIFICATE OF SERVICE

I hereby certify that I have attached a copy of the foregoing has been served on all parties of record in accordance with the Commission's Rules of Practice and Procedure.


Frank R. Heselton

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