

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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  
FILING OF RESPONSES TO UNITED PARCEL SERVICE INTERROGATORIES**

The United States Postal Service hereby moves that it be permitted to file two calendar days late its responses to the following interrogatories filed on October 19, 2001: UPS/USPS-T1-43, 44, 53 and 54.

By operation of Presiding Officer's Ruling No. R2001-2/MC2001-2/2, these responses were due to have been filed on the morning of October 23, 2001. Production of responsive information required reliance upon and consultation with personnel who, despite their diligence, could not meet that deadline.

Copies of the responses were e-mailed to UPS counsel before being filed at the Commission to minimize any prejudice resulting from the two-day delay. Accordingly, the Postal Service moves that its filing be accepted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

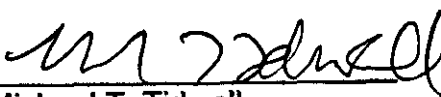


Michael T. Tidwell

October 25, 2001

## 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.

  
Michael T. Tidwell

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