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 RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PATELUNAS TO INTERROGATORIES OF UNITED PARCEL SERVICE REDIRECTED FROM WITNESS TAYMAN (UPS/USPS-T6-1-6)

The United States Postal Service hereby moves for late acceptance of Response of United States Postal Service Witness Patelunas to Interrogatories of United Parcel Service Redirected from Witness Tayman (UPS/USPS-T6-1-6).

The response should have been filed on Wednesday, October 24, 2001. It is thus two business days late. This delay was caused by the need to coordinate among various functional groups. The Postal Service regrets any inconvenience, but does not believe that anyone will be prejudiced by the brief delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 October 26, 2001

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.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 October 26, 2001