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

RECEIVED
OCT 29 | 21 PM 'OI

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

## MOTION TO ACCEPT LATE FILE INTERVENTION

Pitney Bowes Inc. ("Pitney Bowes") respectfully requests that the Commission accept the Notice of Intervention simultaneously being submitted in this docket and permit Pitney Bowes to participate as a full intervenor in this matter.

Good cause for the Commission's grant of this Motion exists. Substantive proceedings in this docket have not commenced and a grant of intervention status to Pitney Bowes will not result in any delay or disruption of the orderly conduct of this case.

Respectfully submitted,

Ian D. Volner

N. Frank Wiggins

Venable, Baetjer, Howard & Civiletti, LLP

1201 New York Avenue, N.W.

= D. Val

**Suite 1000** 

Washington, DC 20005-3917

202.962.4800

idvolner@venable.com

nfwiggins@venable.com

Counsel to Pitney Bowes Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this 29th day of October, 2001, served the foregoing document upon the Postal Service in accordance with section 20a of the rules of practice.

Ian D. Volner