

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

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Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

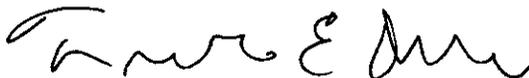
OFFICE OF THE CONSUMER ADVOCATE
MOTION FOR LATE ACCEPTANCE OF MOTION
TO COMPEL PRODUCTION OF DOCUMENTS
REQUESTED IN OCA/USPS-51-57
(October 30, 2001)

The Office of the Consumer Advocate (OCA) hereby moves for late acceptance of its motion to compel production of survey results, studies, and related material requested in interrogatories OCA/USPS-51-57, filed September 28, 2001. The motion to compel was due yesterday, October 29, 2001 and is therefore one business day late.

Undersigned counsel for the OCA completed the complex motion and transmitted it to the office for filing by electronic mail. Errors by counsel or an incompatibility between the office and home computer systems and software created significant formatting errors, which took several hours to correct, making it impossible to generate a legible electronic or paper copy for filing in a timely fashion.

OCA regrets any inconvenience but believes that no prejudice to any party will result from permitting the filing the motion one day late.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Frederick E. Dooley". The signature is fluid and cursive, with the first name being the most prominent.

Frederick E. Dooley
Attorney

Shelley S. Dreifuss
Acting Director
Office of the Consumer Advocate

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.



h'Enri Whitseyjohnson

Washington, D.C. 20268-0001
October 30, 2001