

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

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POSTAL RATE AND FEE CHANGES, 2001

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF  
RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO UPS INTERROGATORIES UPS/USPS-T6-7-8  
REDIRECTED FROM WITNESS TAYMAN  
(October 31, 2001)

The United States Postal Service hereby moves for late acceptance of its response to the following interrogatories of United Parcel Service: UPS/USPS-T6-7-8, filed on October 10, 2001. These responses were delayed by the unavailability of key personnel needed to draft and review them, the need to coordinate among various functional groups, as well as by confusion regarding responsibility for producing the responses. The Postal Service regrets the delay, but does not believe that the delay will be prejudicial to any party.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

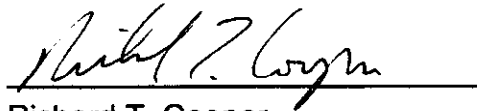


Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2993; Fax -5402  
October 31, 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.

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", is written over a horizontal line.

Richard T. Cooper

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