

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 OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF RESPONSES OF
TO INTERROGATORIES AND PRESIDING OFFICER'S INFORMATION REQUEST

The United States Postal Service hereby moves for late acceptance of following documents.

November 2, 2001, response of witness Moeller to DFC/USPS-T28-2(d)

This which was due on October 12, 2001. Witness Moeller's response to this subpart was contingent upon the institutional responses to DFC/USPS-T28-2(a-c), which were not filed until October 18, 2001. Undersigned counsel's failure to bring to witness Moeller's attention the responses to the redirected portions of DFC/USPS-T28-2, the weight of responsibilities associated with other Commission proceedings, as well as the litigation and exploration of the prospect of settlement of the instant proceeding, contributed to both the witness and counsel not filing the response to this interrogatory until today, a total of 21 calendar days late. However, any prejudice resulting from this delay is minimized by the nature of the question and the response, as well as the fact that there is ample time to conduct follow-up discovery.

November 5, 2001, response of witness Moeller to POIR 2, Question 6

This was due on October 31, 2001. Witness Moeller was not able to complete the necessary consultations with other witnesses and counsel until the end of the day

on Friday, November 2nd, but too late to be filed on that date. As a result, the response could not be filed until today, five calendar days late.

November 5, 2001, responses of witness Moeller to DMA/USPS-T28-1 and 2

These were due to have been filed on Friday, November 2, 2001. The responses were prepared and printed in time for a timely filing on that date. At the last second, it was discovered that the attachment to the response to DMA/USPS-T1-1 had been inadvertently omitted from the package. By the time the oversight was corrected, the Postal Service's messenger had left for the Commission to ensure the timely filing of the other 25 documents being filed that day. As a result, the completed responses to these interrogatories could not be filed until today, three calendar days late.

November 5, 2001, responses of witness Miller to MMA/USPS-T22-1, 2, 4(a, e, f), 5(a, b), 6(a), 7(a, b), 8(b-d), 9-15, 16(a-c), 17(a, b), 18, 19, 20(a, f) 21(a-c), 22, 22A, 23-25

November 5, 2001, responses of witness Schenk to MMA/USPS-T22-21(d-f), redirected from witness Miller

November 5, 2001, USPS responses to MMA/USPS-T22-3, 4(b-d), 16(d), 17(c)

Answers to MMA/USPS-T22-1 through 25 were due to have been filed on Wednesday, October 31st. These questions contained scores of inter-related subparts, as well as many questions beyond the scope of witness Miller's testimony that had to be redirected to other witnesses and for institutional responses. Because of the relationships among many of the questions, the development of one response could affect the preparation of many others. Preparation of some of the responses resulted in the discovery of a need to make corrections to USPS-T-22, as well as USPS Library References J-60 and J-84. The review and production of interrogatory responses, as well as errata (in both hard-copy and electronic form) was a complicated undertaking,

which could not be completed until this past weekend. As a consequence, the responses and related materials could not be filed until today.

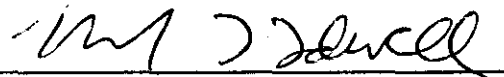
The Postal Service regrets any inconvenience but does not believe that any party has been prejudiced by the delay in the filing of the aforementioned responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 5, 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.



Michael T. Tidwell

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November 5, 2001