

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF RESPONSES
TO INTERROGATORIES OF DAVID POPKIN
(November 9, 2001)

The United States Postal Service hereby moves that it be permitted to file responses to the following interrogatories 36 calendar days late: DBP/USPS-24(e), 27(f), and 30. The responses were due to have been filed on October 4, 2001.

DBP/USPS-24(e) and 27(f)

The first two questions required consultations with Headquarters personnel in Logistics whose ordinary responsibilities have been superseded by the extraordinary demands placed upon the Postal Service by the events of September 11, 2001, and the more recent acts of terrorism committed through the use of the mails.

It is impossible to overstate the degree of dedication that these employees have shown and continue to show in managing the unprecedented operational challenges faced by the Postal Service. Their devotion to managing these emergencies has made it very difficult to find them, to arrange mutually convenient times for them to meet with persons whose responsibilities relate to Docket No. C2000-1. Under the circumstances, they have given the highest priority to the demands generated by the current emergencies and have only been able to provide necessary assistance in Docket No. C2001-3 on a very limited basis. At the same time, undersigned counsel has been involved in the litigation of Docket No. R2000-1 and the recently terminated Docket No. R2001-2. Consultations necessary to identify and review responsive information have

been difficult to arrange and could not be completed until earlier this week. As a result, responses to these two interrogatories could not be prepared until yesterday for filing today.

DBP/USPS-30

This response required the retrieval and review of records from the Office of the Inspector General. Inexplicably, it took several requests before arguably responsive records arrived at the Law Department a few days ago. The records do not appear to have any material bearing on the issues in this proceeding, but they have been reviewed and filed in a Library Reference today anyway.

Notwithstanding the delay, the Postal Service considers that no party has been prejudiced, as there still is plenty of time for discovery which would follow-up the responses to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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November 9, 2001

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record.

Michael T. Tidwell

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