

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 13, 2001)

The United States Postal Service hereby moves that it be permitted to file responses to the following interrogatories 15 calendar days late: DBP/USPS-38, 43, and 47. The responses were due to have been filed on October 29, 2001.

DBP/USPS-38 and 47

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questions required consultations with Headquarters personnel in Logistics whose ordinary responsibilities have been superseded by the extraordinary demands placed upon the Postal Service by the events of September 11, 2001, and the more recent acts of terrorism committed through the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

The long hours that these employees continue to work in managing the unprecedented operational challenges faced by the Postal Service has made it very difficult to arrange mutually convenient times for consultations. 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 develop the responses to these interrogatories could not be completed until yesterday. As a result, responses to these two interrogatories could not be prepared until today.

DBP/USPS-43

This response required a wide-ranging search of records to determine whether copies of documents reflecting polices from over a decade ago were still in existence or whether the institutional memories of certain personnel might prove useful. Numerous leads were pursued, but they bore no fruit, as is reflected by the response filed today. The response was delayed in the hope that additional time would produce a more definitive answer.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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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