

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 FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES  
POSTAL SERVICE WITNESS SCHENK TO INTERROGATORIES OF  
MAJOR MAILERS ASSOCIATION  
(MMA/USPS-T43-1-9)

The United States Postal Service hereby moves for late acceptance of the responses of witness Schenk to MMA/USPS-T43-1-9, filed today. These responses were due to be filed on Wednesday November 7<sup>th</sup>, seven calendar days ago. The 56 subparts in this interrogatory set are complicated and the responses required consultations and reconsultations among several departments that could not be completed in time to permit a timely filing. Accordingly, the responses are being filed today. The Postal Service regrets the delay, but offers that no party has been prejudiced by it. It also notes that it filed the responses electronically and sent an electronic copy to counsel for Major Mailers Association before noon today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

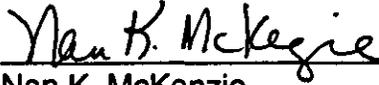
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Nan K. McKenzie

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November 14, 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.

  
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Nan K. McKenzie

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November 14, 2001