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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001–1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE TO THE OFFICE OF CONSUMER ADVOCATE'S MOTION TO COMPEL

The United States Postal Service hereby moves for late acceptance of its response to Office of Consumer Advocate's Motion to Compel production of documents requested in OCA/USPS-119 and –123(a). The response is due on November 26, 2001. However, those postal employees needed to properly respond to the OCA's motion will not be available until Monday, November 26, 2001. In addition, the undersigned counsel will be on vacation during the Thanksgiving holiday, and will not return until November 27, 2001. Therefore, the Postal Service requests a 2-day extension to file its response. The Postal Service regrets any inconvenience but does not believe that any party will been prejudiced by this delay.

Respectfully submitted, UNITED STATES POSTAL SERVICE By its attorneys: Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Joseph K. Moore

November 21, 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.

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268-3078, fax -5402 November 21, 2001