

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF RESPONSES TO INTERROGATORIES
OF MAJOR MAILERS ASSOCIATION AND KEYSpan ENERGY

The United States Postal Service hereby moves for late acceptance of the filing of the following interrogatory responses this week:

November 21, 2001

the responses of witness Miller to KE/USPS-T22-1 through 6(A-C,E,F), 7 through 12, 14 through 17(A-I), and 18;

the USPS responses to KE/USPS-T22-13, 17(J) and 19, redirected from witness Miller;

November 23, 2001

the responses of witness Miller to MMA/USPS-T22-33(A-J,L-N,Q), 34 through 38(C,D,F-K), 39(A,B,E-J) and 40;

the USPS responses to MMA/USPS-T22-33(K,O,P), 38(A,B,E) and 39(C,D), redirected from witness Miller.

All of these responses were due to have been filed on November 19, 2001. Preparation of these responses was delayed by the need to prepare the errata to USPS-T-22 that were filed on November 16, 2001. Those errata were relevant to a number of the interrogatories listed above. Accordingly, the responses could not be prepared until the errata were completed. The Postal Service regrets the delay, but considers that no party has been prejudiced by it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 23, 2001