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

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POSTAL RATE COMPOSITION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

## MOTION FOR LATE ACCEPTANCE OF OBJECTIONS OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OCA/USPS-180-181 (November 23, 2001)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby moves for late acceptance of its objections to interrogatories OCA/USPS-180-181, filed on November 9, 2001. The filing of these objections was delayed due to the general press of business and by the unavailability of necessary personnel during Thanksgiving week. Although these objections are being filed three business days late, the late filing ultimately should not cause any significant procedural delay, as the interrogatories in question are similar to previous interrogatories currently subject to motion practice and awaiting resolution. See Objections of United States Postal Service To Interrogatories OCA/USPS-64-73, 77-78 (October 29, 2001), Opposition of United States Postal Service To Oca Motion to Compel Production of Documents Requested in OCA/USPS-64(c), 65-73, 77-78 (November 20, 2001). The Postal Service regrets the delay, but believes that no party

will be prejudiced by the granting of this motion.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 November 23, 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.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 November 23, 2001