

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF
FILING OF OBJECTION AND RESPONSES TO INTERROGATORIES
(November 26, 2001)

The United States Postal Service hereby moves that it be permitted to file the following documents late: its November 26, 2001 objection to DBP/USPS-88, and its November 26, 2001, responses to DBP/USPS-83-87 and 89-91.

The objection was due to have been filed on or before November 15, 2001. Undersigned counsel's attendance to other responsibilities in this docket, not to mention those associated with Docket No. R2001-1, made it impossible to initiate consultations with clients in a timely manner to discuss potential objections. The need to file the objection to DBP/USPS-88 did not become apparent until draft responses were submitted to counsel on the afternoon of November 19th. Even then, the press of other Docket No. C2001-3 and R2001-1 commitments prevented the preparation of an objection until yesterday for filing today.

The above-referenced interrogatory answers were due to have been filed on or before November 19, 2001. As indicated above, draft responses were first transmitted to counsel that afternoon. However, because of the need to review and prepare other pleadings filed last week, the draft responses to DBP/USPS-83-87 and 89-91 could not be reviewed until Friday, November 23rd, and the consultations necessary to finalize the responses could not be completed until yesterday. Accordingly, the responses were filed today, a week late.

- 2 -

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel
Ratemaking

Michael T. Tidwell
Attorney

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 in this proceeding.

Michael T. Tidwell

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