

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

Complaint on First-Class Mail Service Standards
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Docket No. C2001-3

UNITED STATES POSTAL SERVICE MOTION
FOR A ONE-DAY EXTENSION OF TIME
TO FILE OPPOSITION TO MOTION TO COMPEL
(November 26, 2001)

The United States Postal Service hereby moves that it be permitted to file one calendar day late its opposition to the November 19, 2001 motion of David Popkin seeking to compel responses to DFC/USPS-71(c) and 76.

That opposition was due to have been filed today. A substantially completed 4-page draft was prepared this weekend for final review by interested management personnel this morning.

When counsel went to retrieve the electronic file containing that draft this morning, it could not be found. A search of electronic file directories where the document could have been filed has been searched in vain. It appears that the electronic file has either been lost or irretrievably misfiled.

This afternoon, counsel was able to retrieve a discarded hard copy version of an earlier draft of the pleading from the "circular file" in his office. Counsel expects to be able to reconstruct a final version of that document no later than tomorrow. Accordingly, the Postal Service moves that it be permitted to file its opposition tomorrow, one day late.

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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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