

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 KEYSpan ENERGY

The United States Postal Service hereby moves for late acceptance of the responses to the following interrogatories filed today, one calendar day late: KE/USPS-T-22-20 and 21.

These responses were due to have been filed yesterday. The responses were prepared and converted to PDF format in anticipation of filing (hard copy and electronically) with the Commission and service on the parties. For some unknown reason, the hard copy version of the responses was not xeroxed and filed with the Commission, although counsel submitted the electronic PDF version to the Commission for posting on its website.

It is not known whether a copy of the responses was sent to the Postal Service's printing contractor for printing and mailing to the parties.

To correct this apparent oversight, the Postal Service is filing the responses today under the assumption that yesterday's hard copies never made it to the Commission and were not served upon the parties. The Postal Service regrets the delay caused by this apparent oversight.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

November 29, 2001

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. I am more certain than I was yesterday.

Michael T. Tidwell

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November 29, 2001