

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF
UNITED STATES POSTAL SERVICE
TO INTERROGATORIES UNITED PARCEL SERVICE
(UPS/USPS-10-11)

The United States Postal Service hereby moves for late acceptance of its response to interrogatories UPS/USPS-10-11, filed on November 1, 2001. The responses were due on November 15, 2001 and are thus 18 business days late. The interrogatories asked for information that potentially would have been maintained in one of the Postal Service's many data systems. The Postal Service conducted an exhaustive and timely search to locate the specific information. As a result, it is now filing a response. The Postal Service regrets any inconvenience but does not believe that any party has been prejudiced by this delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Joseph K. Moore

December 3, 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.

Joseph K. Moore

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December 3, 2001