

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
RESPONSES TO UNITED PARCEL SERVICE INTERROGATORIES

The United States Postal Service hereby moves that the following filings be accepted late. The first three are being filed today and the fourth is expected to be filed tomorrow.

- Response of United States Postal Service Witness James M. Kiefer to Interrogatories of United Parcel Service (UPS/USPS-T33-1-2, 5, 9, 10, 15(a) & (h), 16-19)
- Response of United States Postal Service Witness James M. Kiefer to Interrogatories of United Parcel Service Redirected from Witness Moeller (UPS/USPS-T28-22, 23, 27, and 28)
- Response of the United States Postal Service to Interrogatories of United Parcel Service Redirected from Witness Kiefer (UPS/USPS-T33-4, 11, 12, and 14)
- Response of the United States Postal Service to Interrogatories of United Parcel Service Redirected from Witness Moeller (UPS/USPS-T28-29, 30, and 32)

The delay was a result of the confusion created and additional coordination required because the two sets of interrogatories filed by UPS on November 19, 2001, contained several duplicative questions to witnesses Moeller and Kiefer, and, moreover, several of these questions were misdirected to these witnesses and had to be redirected. Additional time was required to ensure the accuracy of the labyrinthine cross-references thereby necessitated, as a perusal of the various documents will demonstrate better than further narrative description. The original two sets of

interrogatories resulted in seven substantive filings, some of which are entirely or mostly cross-references to other answers.¹

It should be noted that the response to UPS/USPS-T33-14 is merely a cross-reference to the response to UPS/USPS-T28-32, which asked the same question, but which has not been filed yet. The Postal Service did not want to further delay the filing of the several Kiefer interrogatories redirected to the Postal Service or created needless additional separate filings. Once the Postal Service responses to the redirected Moeller interrogatories are filed, the record will be clear.

The Postal Service does not believe any party will be prejudiced by the delay and would request that UPS and other participants refrain from creating this situation in the first place by directing questions to the appropriate witness and doing so only once.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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December 4, 2001

¹ In addition to the four documents which are the subject of this motion, the following progeny were filed yesterday: Response of United States Postal Service Witness Moeller to Interrogatories of United Parcel Service (UPS/USPS-T28-21 and 31); Response of United States Postal Service Witness Kingsley to Interrogatories of United Parcel Service Redirected from Witness Kiefer (UPS/USPS-T33-6-8); Response of United States Postal Service Witness Kingsley to Interrogatories of United Parcel Service Redirected from Witness Moeller (UPS/USPS-T28-24-26) (which simply say see responses of witness Kingsley to UPS/USPS-T33-6-8).

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.

Scott L. Reiter

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