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

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POSTAL RATE COMMICSORA
OFFICE OF THE SEGMETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF THE UNITED STATES POSTAL SERVICE TO UPS INTERROGATORY UPS/USPS-T30-2 REDIRECTED FROM WITNESS SCHERER (December 4, 2001)

The United States Postal Service hereby moves for late acceptance of its response to the following interrogatory of United Parcel Service: UPS/USPS-T30-2, filed on November 1, 2001. This interrogatory response was delayed due to the need to coordinate among various functional areas within the Postal Service, including database programmers in Raleigh, North Carolina. As the delay was unavoidable, the Postal Service considers that no party will be unfairly prejudiced by the delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993; Fax –5402 December 4, 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.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993; Fax –5402 December 4, 2001