

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

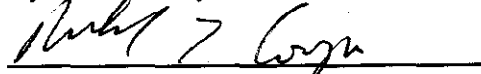
MOTION FOR LATE ACCEPTANCE OF
RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES UPS/USPS-8,9
(December 4, 2001)

The United States Postal Service hereby moves for late acceptance of its response to the following interrogatories of United Parcel Service: UPS/USPS-8,9, filed on November 1, 2001. These responses were delayed by the unavailability of key personnel needed to draft and review them, the need to coordinate among various functional groups, as well as by confusion regarding responsibility for producing the responses. The Postal Service regrets the delay, but does not believe that the delay will be prejudicial to any party.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

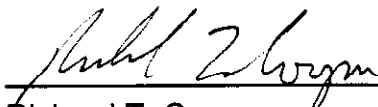


Richard T. Cooper

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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

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December 4, 2001