

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

RECEIVED
Dec 6 4 37 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK TO JOINT INTERROGATORIES OF THE AMERICAN BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF PRESORT MAILERS (ABA&NAPM/USPS-T43-1-2, 3 a-e, 4-12)

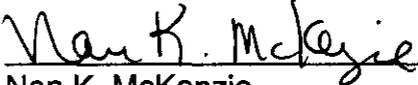
The United States Postal Service hereby moves for late acceptance of the responses of witness Schenk to the following joint interrogatories of the American Bankers Association and National Association of Presort Mailers: ABA&NAPM/USPS-T43-1-2, 3 a-e, 4-12, filed on November 21, 2001. These responses were due to be filed December 5, one calendar days ago. The press of litigation and the need to consult with a variety of sources delayed the filing. The Postal Service regrets the delay, but offers that no party has been prejudiced by it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

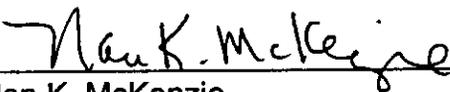
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3089 Fax -5402
December 6, 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.



Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
December 6, 2001