

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 RESPONSES OF
UNITED STATES POSTAL SERVICE WITNESSES KANEER, MAYO, AND NIETO
TO INTERROGATORIES OF DAVID B. POPKIN,
REDIRECTED FROM THE POSTAL SERVICE
(DBP/USPS-1, 3, 18, 19, 20-27, 29, 37, 45, 47-50, 52, 60-61, 70, 72, AND 75-80)
(December 11, 2001)

The United States Postal Service hereby moves for late acceptance of the responses of witnesses Kaneer, Mayo, and Nieto to the following interrogatories of David B. Popkin: DBP/USPS-1, 47-50, 52, 60, and 80 (Kaneer); DBP/USPS-3, 18, 19(a-c), 20-25(a-d), 26-27, 29, 37, 45(a, d, f, h, j, k, m-p, r), 61, 70, 72, and 75 to 79 (Mayo); and DBP/USPS-19(d-g), 25(e-f), and 45(b-c, e, g, i, l, and q) (Nieto), filed on November 26, 2001, and redirected from the Postal Service. All of these responses are being filed one day late, as they required coordination among several witnesses and other postal employees, and yesterday was the deadline for a substantial quantity of responses.

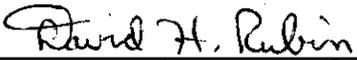
The Postal Service believes any prejudice from the one-day delay will be minimal, as the witnesses involved do not have hearings until January.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

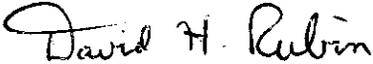
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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.



David H. Rubin

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December 11, 2001