

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 INTERROGATORY UPS/USPS-13,
AND OPPOSITION TO MOTION TO COMPEL
(December 11, 2001)

The United States Postal Service hereby moves for late acceptance of its response to the following interrogatory of United Parcel Service: UPS/USPS-13, filed on November 5, 2001. This response was delayed due to the need to investigate the history and nature of the litigation underlying the interrogatory, which, in turn required the involvement of legal resources not customarily assigned to Commission litigation. Furthermore, development of the response required consultation with a number of functional areas in the Postal Service for input and review. Finally, the general press of business prevented an earlier response. As the delay was inevitable, the Postal Service considers that no party will be prejudiced by it.

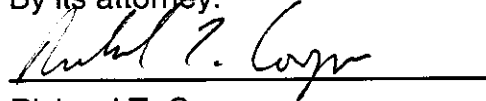
The Postal Service notes that on December 7, 2001, UPS filed a motion to compel a response to this interrogatory. As the response has now been filed, the Commission

should find that the issue has become moot, and deny the motion.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

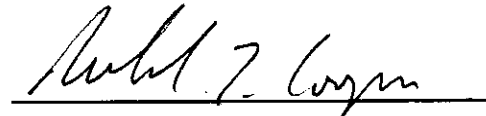


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
December 11, 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
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