

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 UNITED STATES POSTAL
SERVICE TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION
(MMA/USPS-3)

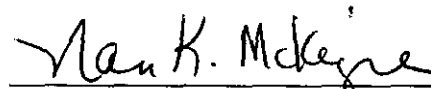
The United States Postal Service hereby moves for late acceptance of the responses of witness Schenk to MMA/USPS-3, filed today. These responses were due to be filed November 30, eleven calendar days ago. The answers required the consultation with an R94 witness and the retrieval and evaluation of archived data that was not completed until this past weekend. The written response was not finalized until yesterday afternoon, too late to file. 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.
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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.



Nan K. McKenzie

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December 11, 2001