

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF
UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OCA/USPS-241-42, 244, 248-53
(December 12, 2001)

The United States Postal Service hereby moves for late acceptance of its response to interrogatories OCA/USPS-241-42, 244, 248-53, the first three of which were filed on November 21, 2001, and the rest of which were filed on November 23, 2001. The responses was due on December 5 or December 7 and are thus 7 or 5 days late. This delay was caused by the needs to coordinate among a wide range of functional areas, and witnesses and attorneys. The Postal Service regrets any inconvenience but does not believe that any party has been prejudiced by this delay,

especially as these interrogatories relate to non-postal products or services. These interrogatories were also the subject of partial objections filed on December 3, 2001.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 12, 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.

Kenneth N. Hollies

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December 12, 2001