

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

MOTION FOR LATE ACCEPTANCE OF OBJECTIONS TO
TO INTERROGATORIES DBP/USPS-118-123
(December 14, 2001)

The United States Postal Service hereby moves for late acceptance of its objections to the above-captioned interrogatories. The interrogatories were filed on November 28, 2001. Objections were due to have been filed on December 10, 2001.

Client consultations regarding objections were completed over the weekend of December 8th and 9th. However, the press of other Docket No. C20001-3 pleadings due on December 10th prevented a timely statement and filing of those objections. Other responsibilities in Docket No. C2001-3, as well as the litigation and ongoing attempt to settle Docket No. R2001-1, have prevented undersigned counsel from preparing objections until last night and filing them today. The Postal Service regrets this unavoidable delay, but considers that the prejudice has been minimal. To further mitigate any impact of the delay on Mr. Popkin, undersigned counsel attempted to e-mail a copy of the Postal Service's objections to DBP/USPS-118-123 last night, but was inexplicably unable to access the USPS HQ e-mail system.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel
Ratemaking

Michael T. Tidwell
Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

Michael T. Tidwell

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December 14, 2001