

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 WITNESS SCHENK TO JOINT INTERROGATORIES OF THE AMERICAN
BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF PRESORT MAILERS
(ABA&NAPM/USPS-T43-13-41)

The United States Postal Service hereby moves for late acceptance of the responses of witness Schenk to the following joint interrogatories of the American Bankers Association and National Association of Presort Mailers: ABA&NAPM/USPS-T43-13-41, filed on November 26, 2001. These responses were due to be filed December 10, four calendar days ago. The press of litigation and the need to consult with a variety of sources delayed the filing. To mitigate the delay, the undersigned as sent an electronic version of the document to requestors' counsel early this afternoon. 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.
Chief Counsel, Ratemaking

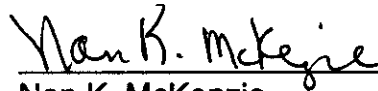


Nan K. McKenzie

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December 14, 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 14, 2001