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 RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS XIE TO INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION (PSA/USPS-T2-1-3) December 20, 2001

The Postal Service hereby moves for late acceptance of witness Xie's response to PSA/USPS–T2–1-3 one business day late. The responses are late largely because the undersigned counsel was unable to be in the office yesterday for personal reasons. Two of the three late-filed interrogatories were not proper follow-up, although the Postal Service has chosen to answer them while reserving the right to follow upon these responses. Moreover, witness Xie completed her appearance in the hearing room prior to the due date of these

interrogatories. Accordingly, there seems little likelihood that any participant will

be prejudiced by the late filing.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Kenneth N. Hollies

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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

December 20, 2001