

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268B0001

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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 KANEER TO INTERROGATORY OF DAVID B. POPKIN
(DBP/USPS-51, REDIRECTED FROM THE POSTAL SERVICE)

The United States Postal Service hereby moves for acceptance, 9 business days late, of the response of witness Kaneer to the following interrogatory of David B. Popkin: DBP/USPS-51, filed on November 26, 2001, and redirected from the Postal Service. The response was delayed because of the workload from other discovery, and the need to obtain protective conditions before the response could be provided.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

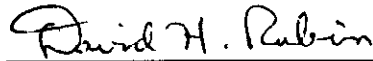


David H. Rubin

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December 21, 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.



David H. Rubin

475 L'Enfant Plaza West, S.W.
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December 21, 2001