

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 THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN
DBP/USPS-95
(January 3, 2002)

The United States Postal Service hereby moves for late acceptance of its response to the following interrogatory of David B. Popkin, DBP/USPS-95, filed on December 17, 2001. The response was nominally due on December 31, 2001 and is accordingly two business days late. The response was delayed by the fact that Popkin has advanced numerous interrogatories, including this one, whose clarity is poor, that purport to be follow-up when in fact they are not, and which mis-state or mis-characterize previous responses. The delay in responding was also occasioned by the need to attend to other matters in this docket, the fact that many postal employees were not in the office during the holidays, and the undersigned counsel's priority in attending to certain personal issues.

Interrogatory DBP/USPS-95 is also objectionable since it is not proper follow-up and was filed after the deadlines for filing institutional or witness-specific interrogatories (the latter of which, in any event, Mr. Popkin has not done in this docket). Further, this interrogatory mischaracterizes the response to OCA/USPS-299, to which DBP/USPS-95 purports to follow up. Interrogatory OCA/USPS-299 inquired into the procedures used to ensure that accurate information is loaded into POS ONE retail terminals. The

response addressed current procedures by which the information in them is updated as well as the frequency; some limitations of the status quo are also acknowledged. In no sense were the technical limits of POS ONE terminals addressed in the question or the response.

Interrogatory DPB/USPS-95, however, asserts as fact that OCA/USPS-299 addresses the limits of retail terminals; quite simply, that statement is factually inaccurate. Accordingly, while DBP/USPS-95 is not appropriate follow-up to OCA/USPS-299, it seems simpler just to answer the question than enter into motions practice. As might be expected, the Postal Service reserves the right to object to any further attempts to follow upon the response provided to DBP/USPS-95.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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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

January 3, 2002