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WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2001

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: Docket No. R2001-1
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AMERICAN BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF PRESORT
MAILERS JOINT MOTION FOR LEAVE TO FILE LATE SUPPLEMENTAL INTERROGATORY
TO ROBINSON (ABA&NAPM/USPS-T29-35)

(January 9, 2002)

American Bankers Association and National Association of Presort Mailers hereby request leave to file late Supplementary Interrogatory to Postal Service witness Robinson, ABA & NAPM/USPS-T29-35.

This interrogatory is being filed to avoid the need to conduct oral cross-examination of witness Robinson; and ABA&NAPM counsel have been authorized by Postal Service counsel to represent that the Postal Service does not object to this motion.

ABA & NAPM do reserve the right to conduct oral cross-examination of witness Robinson in response to oral cross-examination which any other parties may conduct of witness Robinson.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
NATIONAL ASSOCIATION OF PRESORT MAILERS

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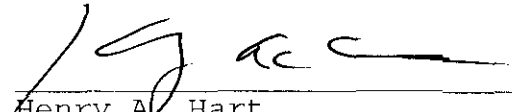
Counsel for
American Bankers Association

Date: January 9, 2002

Washington, D.C.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Henry A. Hart

January 9, 2002