

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

UNITED STATES POSTAL SERVICE
MOTION FOR LATE ACCEPTANCE OF RESPONSE TO UPS/USPS-T28-45
(January 10, 2002)

The United States Postal Service hereby moves that it be permitted to file today the response of witness Moeller to the following interrogatory filed by United Parcel Service on December 10, 2001: UPS/USPS-T28-45.

The response was due to have been filed on December 26, 2001. Preparation of the response required the review and compilation of information from and consultation with all of the rate design witnesses in this proceeding. A number of witnesses were on annual leave during the holidays in December, making it difficult for witness Moeller to complete the compilation and review of responsive information and the consultations with other witnesses in time to make a timely filing of the response. In addition, preparation by various witnesses for their appearances in the hearing room caused further delay. Also, activity related to the prospect of settlement of issues in this proceeding has diverted attention and resources away from the preparation of the response.

The Postal Service regrets the delay, but considers that, given the unique posture of this proceeding, any prejudice to the parties caused by this delay is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

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.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 10, 2002