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

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF DAVID B. POPKIN (DBP/USPS-123(A), 130(D), 138(A-B))

The United States Postal Service hereby moves for late acceptance of its response to the following interrogatory of David B. Popkin: DBP/USPS-123(a), 130(d), and 138(a-b), filed on December 26, 2001. The responses are four business days late because of the need to obtain information from the field, and reviewing delays because of the hearings last week and other workload.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

David H. Rubin

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2986; Fax –6187 January 15, 2002

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. Washington, D.C. 20260–1137 (202) 268–2986; Fax –6187 January 15, 2002