

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

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

MOTION FOR LATE ACCEPTANCE OF FILING OF  
RESPONSES OF CHARLES GANNON ON BEHALF OF  
THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS CARLSON  
(DFC/USPS-52-56)

The United States Postal Service hereby moves that it be permitted to file today, seven calendar days late, the responses of Charles Gannon on its behalf to the following interrogatories of Douglas Carlson: DFC/USPS-52-56, filed on December 26, 2001.

The responses were due to have been filed on January 9, 2002. Draft responses to some of the questions were prepared shortly before that deadline, but retrieval and confirmation of operational details from the field that were necessary to respond to several of the questions could not be completed until after that date. In addition, review of draft responses and consultations with counsel were interrupted by counsel's need to prepare for and participate in Docket No. R2001-1 evidentiary hearings on January 9<sup>th</sup> and 11<sup>th</sup>, as well as settlement discussions.

The Postal Service regrets the delay but considers that it was unavoidable.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Daniel J. Foucheaux  
Chief Counsel  
Ratemaking

---

Michael T. Tidwell  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998/ FAX: -5402  
mtidwell@email.usps.gov  
January 16, 2002

### **CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

---

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998/ FAX: -5402  
mtidwell@email.usps.gov  
January 16, 2002