

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

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POSTAL RATE COMMISSION

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF COMPELED RESPONSE OF
UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OCA/USPS-77
(January 18, 2002)

The United States Postal Service hereby moves for late acceptance of its response to interrogatory OCA/USPS-77, filed on October 17, 2001. This delay was caused by administrative oversight, the press of other client business, and poor coordination among various internal organizations handling the response. In light of the OCA's espoused interest in using the response to inform itself regarding remedies it can supposedly seek in a rate case, no prejudice can have resulted. This is especially true given the few issues challenged by any opposition to the settlement agreement.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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.

K N Hollies

Kenneth N. Hollies

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January 18, 2002