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

FEDERAL BUREAU OF INVESTIGATION
DEPARTMENT OF JUSTICE

: POSTAL RATE AND FEE CHANGES, 2001 : Docket No. R2001-1
: _____

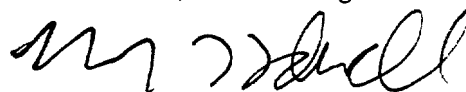
MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF FILING OF RESPONSE
TO INTERROGATORY OF DAVID POPKIN
(DBP/USPS-88)

The United States Postal Service hereby moves for late acceptance of the filing of its response to the following interrogatory directed by David Popkin on December 17, 2001: DBP/USPS-88. The response was due to have been filed on December 31, 2001. Until brought to the attention of postal counsel yesterday by Mr. Popkin, the interrogatory was overlooked by postal counsel and analysts whose Docket No. R2001-1 responsibilities and subject matter expertise made them responsible for ensuring that a timely response was filed. The Postal Service regrets the oversight and the delay in the preparation of the response. However, given the subject matter and the substance of the response, not to mention the status of this proceeding, the Postal Service considers that any prejudice resulting to any party from the untimeliness of its response is slight.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

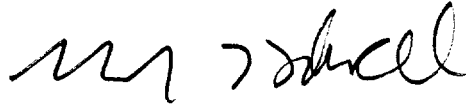


Michael T. Tidwell

January 31, 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.

A handwritten signature in black ink, appearing to read "M. Tidwell", written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 31, 2002