

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF FILING OF RESPONSES TO INTERROGATORIES

The United States Postal Service hereby moves that it be permitted to file late the responses of Charles Gannon to the following interrogatories of Douglas Carlson: DFC/USPS-GAN-57- 59, and the institutional responses to DBP/USPS-142-145. The first set of responses was due to have been filed on February 5, 2002; the second set was due to have been filed on February 11, 2002.

Preparation of answers was delayed either by the need to collect responsive operational minutiae from personnel in the field, or by personnel changes that have taken place as part of the the currently ongoing Reduction-In-Force at USPS Headquarters. Review of draft responses was delayed by undersigned counsel's participation in the recently completed litigation of Docket No. R2001-1.

The Postal Service regrets the delay in the filing of these responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

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March 15, 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.

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March 15, 2002

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