

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

EXPERIMENTAL RATE AND SERVICE CHANGES
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT
WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES
POSTAL SERVICE WITNESS WILSON TO INTERROGATORIES OF
AMERICAN POSTAL WORKERS UNION, AFL-CIO REDIRECTED
FROM WITNESS CRUM
(APWU/USPS-T3-2 (a) -- (c))

The United States Postal Service hereby moves that the response of
Witness Wilson to the following interrogatory of American Postal Workers Union,
AFL-CIO: APWU/USPS-T3-2 (a) –(c), filed on October 31, 2002 and redirected
from witness Crum, be accepted two days late. The delay was caused by the
large number of filings due Tuesday. The undersigned counsel does not believe
that any party will be prejudiced by this short delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Nan K. McKenzie

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November 14, 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.

Nan K. McKenzie

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Washington, D.C. 20260-1137
November 14, 2002