

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 TO INTERROGATORY OF  
AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
REDIRECTED FROM WITNESS PLUNKETT  
(APWU/USPS-T2-11)

The United States Postal Service hereby moves for late acceptance of its response to interrogatory of American Postal Workers Union, AFL-CIO: APWU/USPS-T2-11, filed on October 31, 2002. The response was due on November 14, 2002 and is thus 4 business days late. This delay was caused by the need for discussion involving many people, including witnesses, operations personnel and attorneys, together with

the press of other business . The Postal Service regrets any inconvenience but does not believe that any party has been prejudiced by this delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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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.

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Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
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November 18, 2002