

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

RECEIVED
Oct 23 10 33 AM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

EXPERIMENTAL SUSPENSION OF FEE FOR
MANUAL DELIVERY CONFIRMATION CATEGORY

Docket Nos. R2001-2
MC2001-2

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF
RESPONSES TO UNITED PARCEL SERVICE INTERROGATORIES
(October 23, 2001)**

Today, the Postal Service filed the responses of witness O'Hara to the following interrogatories of United Parcel Service: UPS/USPS-T1-35 through 42.

In accordance with Presiding Officer's Ruling R2001-2/MC2001-2/2 (October 12, 2001), these responses were due to have been filed by noon yesterday.

Notwithstanding the due diligence of witness O'Hara, it was not possible to meet this deadline and the responses could not be filed until this morning.

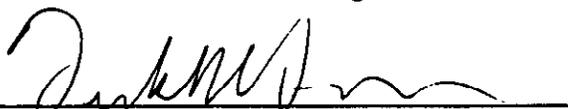
Copies of the responses were transmitted to UPS counsel by e-mail yesterday evening, thereby minimizing and prejudice resulting from the filing of these responses this morning. Accordingly, the Postal Service moves that the responses be accepted for filing this morning.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

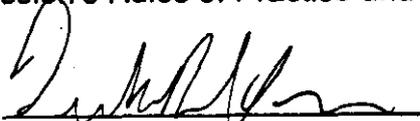
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Frank R. Heselton

CERTIFICATE OF SERVICE

I hereby certify that I have attached a copy of the foregoing has been served on all parties of record in accordance with the Commission's Rules of Practice and Procedure.


Frank R. Heseltin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-4823; Fax -5402
fheselto@email.usps.gov
October 23, 2001