

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR LATE ACCEPTANCE OF FILING OF RESPONSE TO  
PITNEY BOWES INTERROGATORY  
(PB/USPS-6)

The United States Postal Service hereby moves for late acceptance of the filing of its response to the following interrogatory of Pitney Bowes, dated April 19, 2006: PB/USPS-6. The response was due to have been filed on May 3, 2006 – 40 calendar days ago. Consultations among personnel with responsibilities related to the subject matter of the interrogatory could not be completed until late in the day on Friday, June 9<sup>th</sup>. As a consequence, the response could not be prepared and reviewed in time for filing until today. The Postal Service regrets the delay, but believes that the prejudice to the parties is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel, Ratemaking

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Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
[michael.t.tidwell@usps.gov](mailto:michael.t.tidwell@usps.gov)  
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