

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 ITS OBJECTIONS TO  
OFFICE OF THE CONSUMER ADVOCATE INTERROGATORY  
OCA/USPS-34(b)  
(June 23, 2006)

The United States Postal Service hereby moves for late acceptance of the filing of its objections to the following interrogatory of the Office of the Consumer Advocate, filed on May 8, 2006: OCA/USPS-34(b). The objections were due to have been filed on May 18<sup>th</sup>. The Postal Service has delayed filing objections while carefully examining whether it would be possible to respond to this interrogatory without treading upon sensitive intellectual property interests. However, after extensive consultations – both internally and with a non-postal entity whose intellectual property interests are also implicated – the Postal Service has determined that treading upon such interests is unavoidable. Accordingly, the Postal finds it necessary to file its objections today. The Postal Service regrets that these consultations could not have been completed sooner, but considers that the timing of its objections reflects that this course of action was taken only after exploring avenues for avoiding it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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