

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE
OF RESPONSES TO INTERROGATORIES
(DBP/USPS-61 AND 75)
(June 23, 2006)

The United States Postal Service hereby moves for late acceptance of the filing today of its responses to the following interrogatories identified below.

DBP/USPS-61: This interrogatory response was due April 7, 2006. The response was filed today, 77 calendar days late. The delay and the eventual response to the interrogatory reflect that an exhaustive search of collective institutional memory was conducted, but that very little resulted from it. Given the nature of the question and the responsive information, the Postal Service believes that any prejudice resulting from the filing of the response today is minimal.

DBP/USPS-75: Due on May 8th, this response was filed 46 calendar days late. The response required that minute details regarding actual or assumed changes in collection box last pickup times at far-flung locations be collected and analyzed. The task took time and could not be given the highest priority, in light of more pressing AMP administrative tasks and Docket No. R2006-1 litigation-related responsibilities of the person involved. The Postal Service regrets the delay, but believes that any prejudice is minimal, given the weight of the information requested and collected.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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