

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE WITNESS  
FOR LATE ACCEPTANCE OF RESPONSES TO INSTITUTIONAL INTERROGATORIES  
FROM DAVID POPKIN  
DBP/USPS-45(a), 46(a), 47(a), 48(b), 52, 53, 59, 68, and 83  
(July 20, 2006)

The United States Postal Service hereby moves for late acceptance of the responses to the following institutional interrogatories from David Popkin: DBP/USPS-45(a), 46(a), 47(a), 48(b), 52, 53, 59, 68, and 83, filed on June 5, 2006. Responses to most of the interrogatories, and parts of interrogatories, in interrogatory set DBP/USPS-43-85 were filed on June 19, 2006. The cover page to those responses indicated, "Various interrogatories in this set, or parts of such interrogatories, can only be answered after a contractor completes its research to develop responses." That research now having been completed, the remaining responses are being provided. These responses were further delayed by the attempted vacation of the undersigned counsel. Fortunately, many of the questions and responses are quite parallel to matters raised in one or more previous omnibus, so the likelihood of any prejudice is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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