

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

COMPLAINT OF CAPITAL ONE SERVICES, INC.

Docket No. C2008-3

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF RESPONSE TO INTERROGATORY
OF PUBLIC REPRESENTATIVE
(PR/USPS-12)
(March 20, 2009)**

The United States Postal Service hereby moves for late acceptance of its response to PR/USPS-12. The response was due on September 26, 2008, seven days from the issuance of P.O. Ruling No. C2008-3/22. The response was initially delayed by the need to coordinate across a number of functional groups and prepare an appropriate and accurate description of the calculation of the discounts earned by Bank of America under the contract. Around the same time period, the Postal Service and Capital One began extensive discussions regarding the scope of discovery in this docket, which required, and continues to require, a significant investment of internal postal resources. These discussions, and the work involved in electronic document discovery in this case, contributed to the delay in response. The Postal Service regrets the delay but does not believe that any party has been materially prejudiced by it, given the procedural posture of the instant docket over the last several months while the

parties have been resolving discovery issues informally. Accordingly, the Postal Service respectfully moves for late acceptance of its response to PR/USPS-12.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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