

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES
POSTAL SERVICE TO INTERROGATORY OF THE MAGAZINE PUBLISHERS OF
AMERICA, INC., REDIRECTED FROM WITNESS MAYES (MPA/USPS-T25- 2(b))
(June 19, 2006)

The United States Postal Service moves for the late acceptance of its response to the above-listed interrogatory subpart, filed on May 19, 2006 and due on June 2, 2006. The interrogatory subpart was redirected from witness Mayes. The delay of eleven business days was partly due to the fact that the datum sought was not used in any of the dropship models and therefore, was not readily available. In fact, it was not immediately clear that there was a source for the information. After inquiries revealed that there was some, albeit possibly outdated, information that might be used to develop an estimate responsive to the request, the source of the information, the robustness of the estimates, and their relevance to the current operating environment, were questioned. Once it was determined that the data, in combination with the response to TW/USPS-T28-7, were responsive to the question, consultation with key analytical personnel was made difficult by conflicting absences.

Whereas no one was prejudiced by the delay, the Postal Service respectfully requests that the motion for late acceptance be granted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3089; Fax -5402