

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
(March 24, 2006)

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

OCA/USPS-T1-1 through 3 and DBP/USPS-49 through 56: These interrogatories were filed on March 3, 2006. The responses were due to have been filed on March 17, 2006. The responses filed today were a week late.

OCAUSPS-T2-1: This interrogatory was filed on March 6, 2006. The response was due to have been filed on March 20, 2006. The responses filed today were four days late.

OCA/USPS-6 through 16: These interrogatories were filed on March 8, 2006. The responses were due to have been filed on March 22, 2006. The responses filed today were two days late.

Two postal employees whose expertise is vital to the administration and execution of the Postal Service's Evolutionary Network Development initiative and whose preparation and/or review of interrogatory responses is necessary to the progress of this litigation have been out of the office and unavailable for the better part of the last several weeks. As explained in recent pleadings, one spent most of the past three weeks in India securing and overseeing the medical treatment of a seriously ill

parent. The other has been out of the office for the past two weeks tending to a child born last week, his wife and two young children.

In the span during which both were out of the office this month, neither was available to make necessary contributions to the production and review of interrogatory responses. One returned to the office late last week and has worked strenuously to help clear up the existing backlog in interrogatory responses. The Postal Service regrets the delay in the filing of interrogatory responses caused by these circumstances. But, the combination of an unplanned, unavoidable absence and a planned, unavoidable absence among dedicated professionals who share certain responsibilities can make it impossible for an agency even as large as the Postal Service to fulfill specific obligations. And, circumstances such as these remind us that even the most dedicated among us can be forced to make difficult and very understandable choices in balancing professional and personal obligations.

The Postal Service leaves it to the parties to indicate whether they have been prejudiced by the delay until today in the filing of the aforementioned responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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