

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF THE FILING OF ITS RESPONSES TO
AMERICAN POSTAL WORKERS UNION INTERROGATORIES
(APWU/USPS-1 THROUGH 5)
(June 5, 2006)

The United States Postal Service hereby moves for late acceptance of the filing of its responses to the following interrogatories of the American Postal Workers Union: APWU/USPS-1 through 5. The responses were due to have been filed on May 5, 2006 – 31 calendar days ago. A misunderstanding regarding responsibility for preparation of the responses by different units within the same department, the press of business, and undersigned counsel's failure to properly monitor the situation, resulted in a failure of the interrogatories to receive proper attention. The Postal Service regrets the delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
michael.t.tidwell@usps.gov