

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF  
RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS LOETSCHER  
TO INTERROGATORIES OF MAJOR MAILERS ASSOCIATION,  
REDIRECTED FROM WITNESS ABDIRAHMAN  
(MMA/USPS-T22-5 C-D, 6 C) (July 6, 2006)

The United States Postal Service hereby moves for late acceptance of the responses of Witness Loetscher to MMA/USPS-T22-5 C-D, 6 C, which were redirected from witness Abdirahman. The interrogatory was filed on June 19, 2006 and the response was due on July 3, 2006. Initially, the witness to whom these interrogatory parts had been originally directed had decided that he could provide an adequate answer. During the review process, he determined that a more complete answer could be given by witness Loetscher. By the time the question was redirected, the original filing date had passed. The Postal Service regrets this delay of three days, but believes it will not prejudice any party and requests that the response be accepted out of time.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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July 6, 2006

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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July 6, 2006  
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