

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION OF UNITED STATES POSTAL SERVICE  
FOR LATE ACCEPTANCE OF RESPONSES TO  
INTERROGATORIES OF PITNEY BOWES INC.,  
REDIRECTED FROM WITNESS TAUFIQUE  
(PB/USPS-T-32-61-64)

The United States Postal Service moves for late acceptance of the institutional responses to the following interrogatories of Pitney Bowes Inc., redirected from witness Taufique: PB/USPS-T32-61-64. The interrogatories were filed on June 29, 2006, and accordingly due on July 10. The delay was caused by extensive discussion in various departments of the Postal Service regarding the commercial sensitivity of material responsive to the last of these interrogatories, the significance of the promises of confidentiality made to survey respondents, and the possible impact upon future promises of confidentiality to survey respondents if the material is made public. The Postal Service was able to conclude that the material can be made public (see USPS-LR-L-157).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Kenneth N. Hollies  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083; Fax -5402  
July 21, 2006