

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
LATE ACCEPTANCE OF FILING OF RESPONSES OF WITNESS TAUFIQUE
TO INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T32-1 THROUGH 3)

The United States Postal Service hereby moves for late acceptance of the filing of the responses of witness Altaf H. Taufique to the following interrogatories of Newspaper Association of America: NAA/USPS-T32-1 through 3. The responses were due to have been filed on July 13, 2006 -- 12 calendar days ago. The timely preparation of these responses was prevented by the necessity for witness Taufique to give his undivided attention to the preparation of the July 17th filing of USPS-T-48. The Postal Service regrets the delay, but believes that any prejudice to the parties has been minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
michael.t.tidwell@usps.gov
July 24, 2006