

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 THE FILING OF RESPONSE OF  
POSTAL SERVICE WITNESS McCrery  
TO INTERROGATORY OF PITNEY BOWES, INC.  
REDIRECTED FROM WITNESS ABDULKADIR ABDIRAHMAN  
(PB/USPS-T22-12)  
(July 31, 2006)

The United States Postal Service hereby moves for late acceptance of the responses of Postal Service witness Marc D. McCrery to the above-listed interrogatories of Pitney Bowes, Inc. The flood of discovery filed at the close of the initial discovery period regarding the Postal Service's case-in-chief made it difficult for the undersigned counsel to review every response before the filing deadline. Therefore, this response is being filed one business day late. Considering the minimal delay involved, the Postal Service does not believe that any party has been prejudiced.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
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