

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 RESPONSE
TO INTERROGATORY OF PITNEY BOWES INC.,
REDIRECTED FROM WITNESS ABDIRAHMAN
(PB/USPS-T22-11)
(August 1, 2006)

The United States Postal Service hereby moves for late acceptance of the response to Pitney Bowes interrogatory PB/USPS-T22-11, filed on July 14, 2006, and redirected from witness Abdirahman. The response was delayed by the crush of discovery on July 14, 2006, regarding the Postal Service case-in-chief and the need to coordinate across multiple functional areas within the Postal Service. Since the response merely confirms that a response provided in Docket No. R2005-1 retains its vitality, no prejudice should arise from the late filing.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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