

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 RESPONSES TO INTERROGATORIES
OF DAVID POPKIN (DBP/USPS-697 and 698)
(November 24, 2006)

The United States Postal Service hereby moves for late acceptance of its filing of its institutional responses to interrogatories DBP/USPS-697 and 698.

The responses were due to have been filed on November 16, 2006, but were not filed until today, eight calendar days late. An internal communications breakdown resulted in the persons responsible for the subject matter of the interrogatories not being aware of their existence until a motion to compel was filed the day after they were due. The Postal Service regrets the oversight. However, given the subject matter of the interrogatories and the reality that no response to them could possibly add materially to the state of the record on any substantive issue in this proceeding, the Postal Service considers that no prejudice has resulted from the delay.

Contrary to the suggestion at page 2 of Mr. Popkin's November 17, 2006, motion to compel responses to these interrogatories, the Postal Service has no strategy, inclination, plan, incentive, motive or desire to prolong the nature of any of its Docket No. R2006-1 litigation obligations.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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