

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

RATE AND SERVICE CHANGES TO IMPLEMENT  
BASELINE NEGOTIATED SERVICE AGREEMENT  
WITH BANK OF AMERICA CORPORATION

Docket No. MC2007-1

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR  
LEAVE TO FILE RESPONSE TO INTERROGATORIES  
VP/USPS-T1-2-4, 5, PARTS (A)-(D), (F)-(G), 6, PARTS (A)-(D), 7, 11-16  
OUT OF TIME  
(March 30, 2007)**

The United States Postal Service hereby moves that its response to interrogatories VP/USPS-T1-2-4, 5, parts (a)-(d), (f)-(g), 6, parts (a)-(d), 7, 11-16 be accepted out of time. The Postal Service's response to those interrogatories was due on March 23, 2007. The delay was caused by a variety of factors, including the need to coordinate the response among several functional organizations. Given the nature of the inquiry and the current posture of the case, the Postal Service does not believe any party has been prejudiced by the delays. The Postal Service's response to VP/USPS-T1-1, 5, part (e), 6, part (e), 8-10, 17-20 will be forthcoming.

UNITED STATES POSTAL SERVICE

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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March 30, 2007