

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF
RESPONSES TO INTERROGATORIES OF DAVID POPKIN
[DBP/USPS-4, 10, 11, 13, 14]
(May 10, 2005)

The United States Postal Service hereby moves that the Commission accept late its responses to the above-listed interrogatories of David Popkin, filed on April 8, 2005.

For the reasons explained below, the responses were due to have been filed on April 22, 2005, but were not filed until yesterday or today.

DBP/USPS-4

The narrative response to this question was filed on April 22nd and referred to USPS Library Reference K-117, which was not filed until yesterday. The filing of the Library Reference completes the response. The filing of the Library Reference was delayed in order to permit the Postal Service determine whether any files that may have been lost during the archiving process described in the response could be identified and recovered. While the additional time and effort expended since April 22nd did not turn up any more records than were compiled at that time, the Postal Service is satisfied that it has conducted an exhaustive search for responsive records. The Postal Service regrets the delay in its filing of the Library Reference, but considers that there has been no material prejudice, given the tangential relationship between the requested

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information and the issues in this proceeding.

DBP/USPS-10

Undersigned counsel assumes full responsibility for the lateness of the filing of this response. It was prepared for a timely filing and transmitted to counsel, but lost in the flurry of internal e-mail messages from various personnel involved in the circulation of draft responses to the scores questions in this interrogatory set. Counsel apologizes for the oversight. Still, the Postal Service considers that there has been no material prejudice, given the tangential relationship between the requested information and the issues in this proceeding. Moreover, the question and answer break no new ground, having essentially been asked and answered in a recent complaint docket.

DBP/USPS-11, 13, 14

Preparation of these responses required consultations among personnel who have been pressed to complete responses to other discovery requests and other non-litigation assignments. The Postal Service regrets the delay in the responses. However, the Postal Service considers that there has been no material prejudice, given the tangential relationship between the requested information and the issues in this proceeding. Moreover, DBP/USPS-11 and 13 break no new ground, as they essentially confirm information about the EXFC service performance measurement system that has been requested and provided in earlier dockets.

Finally, the Postal Service moves for late acceptance of this motion, insofar as it applies to the filing of Library Reference K-117 and the response to DBP/USPS-10. A

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degradation in the speed of counsel's computer all day yesterday, coupled with several late afternoon computer crashes (with Word and Adobe functions randomly disappearing), resulted in the loss of any opportunity to recover and file the motion for late acceptance that had been drafted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Michael T. Tidwell