

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 THE FILING OF INTERROGATORY RESPONSES
(May 16, 2005)

The United States Postal Service hereby moves that the Commission accept one calendar day late the responses of witness Abdirahman to the following interrogatories: MMA/USPS-T21-11-15, 18-24, 27-32, 34-35. The responses were due to have been filed on May 12, 2005. The extensive number of inter-related questions and the necessary internal review presented a challenge in the preparation of a timely filing of the responses. The Postal Service regrets the one-day delay but believes that the prejudice to any party is insignificant. This motion would have been filed on May 13, 2005, with the late responses but for undersigned counsel's ongoing computer problems that turn the process of converting documents to PDF format into an adventure.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

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.

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