

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 THE RESPONSES TO
DISCOVERY REQUESTS

For the reasons stated below, the United States Postal Service hereby moves for late acceptance of the responses of witness Taufique to the following discovery requests: Presiding Officer's Information Request No. 6, Question; and Valpak interrogatories VP/USPS-T28-46(a) and T28-47(a-f). The responses of witness Taufique were due to have been filed on June 10, four calendar days ago. Notwithstanding his diligence, it was impossible to complete all necessary internal review of the responses until close of business yesterday. Accordingly, the responses could not be filed until today. The Postal Service regrets the unavoidable delay, but believes that any prejudice is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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