

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

Postal Rate and Fee Changes )

Docket No. R2005-1

**MOTION OF AMERICAN POSTAL WORKERS UNION, AFL-CIO, TO FILE  
INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS VAN-TY-SMITH (APWU/USPS T11-1-4)  
ONE BUSINESS DAY LATE  
(June 20, 2005)**

The American Postal Workers Union, AFL-CIO (APWU) hereby requests that interrogatories directed to USPS witness Van-Ty-Smith be accepted for filing one business day late. These interrogatories were prepared for filing by the 4:30 p.m. deadline on June 17, 2005, together with a notice of the APWU's intention to cross examine witness Van-Ty-Smith. Although the notice of intention to cross examine was filed, the interrogatories that had been prepared were inadvertently not submitted for filing until shortly after the 4:30 p.m. deadline.

The filing of these interrogatories will best serve the interests of the Commission and the parties in this case. The responses to these interrogatories will focus and expedite the oral examination of witness Van-Ty-Smith, making that process more useful and less time consuming to the Commission and the parties.

Accordingly, the APWU hereby respectfully requests that these interrogatories directed to USPS witness Van-Ty-Smith be accepted for filing one business day late, on June 20, 2005.

Respectfully submitted,

Darryl J. Anderson  
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#### **CERTIFICATION**

I hereby certify that I have this date served the foregoing document in accordance with the rules of practice.

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Darryl J. Anderson  
O'Donnell, Schwartz & Anderson, P.C.

June 20, 2005