

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 UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF OBJECTION TO INTERROGATORIES
OF THE OFFICE OF THE CONSUMER ADVOCATE.
(OCA/USPS-T7-6-7)
(June 20, 2005)

On Friday, June 17, 2005, the undersigned counsel found that an objection to interrogatories OCA/USPS-T7-6-7 had been prepared and finalized, but never filed. That objection was filed on June 17, but insufficient time was then available to prepare this motion. The Postal Service accordingly moves for late acceptance of its objection to interrogatories OCA/USPS-T7-6-7.

The interrogatories seek data from the Postal Service that are broken down by the month, rather than the quarterly basis by which they are usually presented. Moreover, the underlying ODIS-RPW data system's sampling presumes that quarterly data are the target. The objection includes an estimate of the time and expense necessary for the development of responsive information; given the pace of other discovery matters, no answers could have been provided even by the date of this motion. Had such work been undertaken, other work necessary for responses to discovery requests would likely have been delayed. With the ongoing pace of discovery in this proceeding, the time estimates in the objection now appear optimistic.

The delay of two and a half weeks was inadvertent and not triggered by any inquiry regarding the absence of responses to the underlying interrogatories. Postal

Service counsel emailed the OCA attorney responsible for filing the interrogatories with the hope of determining the extent to which, if at all, the OCA remains interested in the monthly data. In the absence of any response, the Postal Service expects that no prejudice has occurred. The matter may be moot. But if the OCA chooses to press for responses and fund the necessary research, the Postal Service will attempt to facilitate and hasten the work.

WHEREFORE, the Postal Service moves for late acceptance of its June 17, 2006 objection to interrogatories OCA/USPS-T7-6-7.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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