

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 PERMISSION TO FILE THREE DAYS LATE ITS RESPONSE
TO THE DAVID B. POPKIN MOTION TO COMPEL RESPONSES
TO DBP/USPS-88, 90, 129(a)-(b), AND 147
(June 27, 2005)

The United States Postal Service hereby requests permission to file three calendar days late its reply to the June 20, 2005 David B. Popkin Motion to Compel Responses to DBP/USPS-88, 90, 129(a)-(b), and 147.¹ Hearings for the Group A witnesses are currently being conducted, and the need to prepare for and participate in those hearings has prevented the Postal Service from preparing its answer to Mr. Popkin's motion with regard to those interrogatories. The Postal Service expects that a reply can be filed on Thursday, after the Group A hearings are concluded. Accordingly, the Postal Service requests permission to file its reply three days late.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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¹ Mr. Popkin's motion of June 20, 2005 also addressed DBP/USPS-103 and 145. The Postal Service's answer with regard to those interrogatories and requests for production has been filed today.