

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 REPLY TO MOTION TO COMPEL A RESPONSE TO DBP/USPS-139(a) AND (b)
(July 1, 2005)

By motion dated June 27, 2005, the Postal Service requested leave to file its reply to the June 20, 2005, motion of David Popkin to compel responses to DBP/USPS-139(a) and (b). The PDF version of the reply was staged for filing on the Commission website at 4:25 p.m. on June 30th. Counsel executed the SUBMIT command at 4:26p.m., only to receive a screen message that “permission” was “denied.” At that point, counsel’s computer froze. Four minutes of effort to thaw out the computer were rewarded when counsel was able to make a second attempt to file, only to prompt the appearance of the dreaded electronic filing “Ha! I know the clock says 4:30 p.m. but it’s after 4:30 p.m. for purposes of electronic filing, so re-date your document for tomorrow” (or words to that effect) message.

Accordingly, the reply to Mr. Popkin’s motion was re-dated July 1st, this motion was prepared with the same date, and both documents were transmitted yesterday evening so that they could be accepted for filing today.

Any prejudice to Mr. Popkin is greatly outweighed by undersigned counsel’s need for Tylenol as this motion was being composed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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