

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  
FILING OF INTERROGATORY RESPONSES  
[OCA/USPS-9, 22, 23, 25, 26, 28, 29, 37, 40, 41, 42(d), 106, 111, 125]  
(July 7, 2005)

The United States Postal Service hereby moves that the Commission accept the late-filed responses to the above listed interrogatories. All of the responses were due to have been filed between 16 and 47 calendar days before they were filed yesterday. In each case, identification of authoritative sources of responsive information and consultation among interested internal stakeholders took longer than anticipated, making it difficult to file timely responses. With respect to several related questions, an individual whose guidance was critical could not be consulted until recovery from back surgery progressed sufficiently to permit him to concentration on postal matters, notwithstanding his continued absence from the office. The press of other discovery and preparation for hearings has also prevented postal counsel from giving the hunt for responses to these questions the highest priority at all times. Still, a greater degree of diligence on counsel's part might have resulted in some responses being filed sooner than yesterday. The Postal Service regrets the delay in each case and apologizes for any prejudice to any party. For what it is worth, in a few instances, this prejudice has been diminished by the provision of responsive information in earlier-filed answers to interrogatories submitted by other parties.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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