

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 RESPONSES  
TO INTERROGATORIES OF DAVID POPKIN  
[DBP/USPS-164, 165, 172 AND 173]  
(July 18, 2005)

The United States Postal Service hereby moves that it be permitted to file late the responses to the interrogatories listed below:

due on June 29, 2005. – DBP/USPS-164 and 165;

due on June 30, 2005 – DBP/USPS-172 and 173;

Preparation of the responses required consultations among postal personnel whose Docket No. R2005-1 litigation burdens and other pressing responsibilities required that they assign a lower priority to the review and production of responses to these particular interrogatories.

The Postal Service takes seriously the deadlines for responding to interrogatories that are imposed by the Commission's rules. The Postal Service regrets the delay in responding to these particular interrogatories, but it must, at times, assign priority to interrogatories based upon an objective assessment of such matters as their materiality and relationship to the issues in the litigation and the testimony of its witnesses, the proximity of hearings, or any relationship to matters being negotiated among the parties. For these reasons, the Postal Service was unable to devote its undivided attention to

the above listed-interrogatories until nearly three weeks after they were due. In light of the subject matter and the unlikelihood that any intervenor testimony will be filed that is germane to the subject matter of these interrogatories, the Postal Service considers that no party has been prejudiced by the delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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