

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE
OF RESPONSES TO INTERROGATORIES
(March 30, 2006)

The United States Postal Service hereby moves for late acceptance today of the filing of its responses to the following interrogatories identified below.

OCA/USPS-T1-4 through 8: These interrogatories were filed on March 8, 2006. The responses were due to have been filed on March 22, 2006. The responses filed today are eight calendar days late.

OCAUSPS-T1-12 and 14 through 16: These interrogatories were filed on March 9, 2006. The responses were due to have been filed on March 23, 2006. The responses filed today are seven days late.

For purposes of this motion, the Postal Service incorporates by reference the explanation offered in its March 24, 2006, motion for late acceptance. The second of the two employees described therein, whose preparation and/or review of interrogatory responses is necessary to the progress of this litigation returned to the office this week. This has permitted the Postal Service to make progress on the backlog of outstanding interrogatory responses. The Postal Service regrets the delay in the filing of interrogatory responses caused by the circumstances described in its earlier motion.

The Postal Service leaves it to the parties to indicate whether they have been prejudiced by the delay until today in the filing of the aforementioned responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402
michael.t.tidwell@usps.gov
March 30, 2006