

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
(DBP/USPS-16, 42, 44 AND 57)
(April 11, 2006)

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

DBP/USPS-16: This interrogatory response was due March 2, 2006. The response was filed today, 39 calendar days late. The substance of the response, that there were no FY2006 Q2 service standard changes, had earlier been transmitted informally to Mr. Popkin. Given the nature of the responsive information response, the Postal Service believes that any prejudice resulting from the filing of a formal response today is *de minimis*.

DBP/USPS-42 and 44: Due on March 13th, these responses were filed on April 7th, 25 calendar days late. Draft responses were prepared and reviewed in time for filing by the due date, but were placed in the wrong internal electronic file by undersigned counsel and, in the press of business, neglected. An e-mail from Mr. Popkin prompted the initiation of a search which ultimately resulted in recovery of the missing electronic file containing the responses. Undersigned counsel assumes full responsibility for this oversight and apologizes for the delay. The Postal Service leaves it to others to judge the degree of prejudice caused by this delay.

DBP/USPS-57: Due on March 21st, this response was filed on April 7th, 17 calendar days late. The question sought information that was the subject of considerable discovery in Docket No. C2001-3 and that was publicly available to any party willing to assume the burden of reviewing their files from that proceeding. Preparation of a response required a search through the Postal Service's Docket No. C2001-3 files by postal personnel responsible for reviewing and implementing FY 2006 Q3 service standard changes in connection with Area Mail Processing consolidation decisions. An opportunity to give undivided attention to this interrogatory and to review files from Docket No. C2001-3 did not materialize until last week. Accordingly, the answer was prepared and filed last week. The Postal Service regrets the delay, but believes that any prejudice is mitigated by the fact that the responsive information is in the form of the numerous Docket No. C2001-3 interrogatory responses available to any intervenor willing to search through his or her own Docket No. C2001-3 records or the public files of the Postal Rate Commission, rather than relying on the Postal Service to search through its copies of those same records.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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