

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 OF WITNESS WILLIAMS TO INTERROGATORIES
(APWU/USPS-T1-17 AND 18 REDIRECTED FROM WITNESS SHAH)
(April 11, 2006)

The United States Postal Service hereby moves for late acceptance of the filing of the responses of witness Williams to the following interrogatories.

OCA/USPS-T1-17 and 18: These responses were due to have been filed on April 4th, but were not filed until April 7th, 3 calendar days late. In the past two weeks, personnel with the primary responsibility for reviewing AMP proposals and helping to clear the existing backlog of interrogatory responses could not complete all necessary consultations in time to ensure timely production, review and filing of these particular responses. The Postal Service regrets the disruption to the progress of this docket caused by the delay in the production of responses to these interrogatories and defers to others on the question of whether this delay has prejudiced any party.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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