

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF
THE FILING OF RESPONSES TO APWU INTERROGATORIES
REDIRECTED FROM WITNESS WILLIAMS (APWU/USPS-T2-75 THROUGH 78)
(June 9, 2006)

The United States Postal Service hereby moves that the Commission accept for late filing its responses to the following interrogatories of the American Postal Workers Union, AFL-CIO, that were due to have been filed nine calendar days ago on May 30, 2006: APWU/USPS-T2-75 through 78. Preparation of the responses required research by and consultations among personnel whose considerable Area Mail Processing-related responsibilities have required extensive travel in the past few weeks, preventing them from giving these interrogatories the highest possible priority. The Postal Service regrets the delay, but considers that the prejudice to the parties is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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