

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 ACCEPTANCE OF LATE
FILING OF RESPONSES TO ASSOCIATION OF PRIORITY MAIL USERS
INTERROGATORIES (APMU/USPS-T1-3 AND 4)
(June 12, 2006)

The United States Postal Service hereby moves for late acceptance of the filing of its responses to the following interrogatories of the Association of Priority Mail Users, filed on March 31, 2006: APMU/USPS-T1-3 and 4. The responses were due to have been filed on April 14, 2006. They are 59 days overdue. Preparation and review of the responses required several rounds of consultations among personnel involved. Draft responses have been awaiting counsel's review for the past several weeks. An opportunity to give the responses adequate review did not arise until late last week. Accordingly, the responses could not be filed until today. The Postal Service regrets the delay, but believes that any prejudice to the parties is tempered by the tangential and/or irrelevant nature of much of the requested information, and the fact that much of it is being provided, notwithstanding the filing of timely objections.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
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