

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION OF UNITED STATES POSTAL SERVICE  
FOR LATE ACCEPTANCE OF OBJECTION  
TO INTERROGATORY OF DAVID B. POPKIN  
(DBP/USPS-59(d))  
(June 20, 2006)

The United States Postal Service hereby moves for late acceptance of its objection to part (d) of interrogatory DBP/USPS-59, filed on June 5, 2006. The objection is late because the details of what is requested were recognized only as answers to Mr. Popkin's voluminous set of largely EXFC related interrogatories were being finalized for filing. As shown in the body of the objection, question 59 is itself very complex, and just one of over 40 interrogatories filed together.

The Postal Service devoted substantial resources to responding to Mr. Popkin's set of interrogatories, DBP/USPS-43-85, as reflected in the extensive responses already filed. The Postal Service timely objected in full to four interrogatories, and in part to another, in the set because the documents requested are sensitive and proprietary.<sup>1</sup> The Postal Service is filing its objection to question 59(d) as soon as the need was discovered, given that the responses to

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<sup>1</sup> Objections Of The United States Postal Service To Interrogatories Of David B. Popkin (DBP/USPS-62, 65, 79-80)(June 15, 2006); Partial Objection Of United States Postal Service To Interrogatory Of David B. Popkin (DBP/USPS-85) (June 15, 2006).

most of the set were filed mere minutes before the docket section closed yesterday. Further, no prejudice should result from the late filing of the objection to question 59(d).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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