

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

SECOND NOTICE OF THE UNITED STATES POSTAL SERVICE REGARDING
THE STATUS OF OUTSTANDING DISCOVERY RESPONSES
(June 21, 2006)

As directed by Presiding Officer's Ruling No. 1/17, the United States Postal Service hereby submits a second status report on outstanding discovery responses.

The first full paragraph on page 2 of the Motion of the American Postal Workers Union, AFL-CIO, to Extend Discovery (May 17, 2006) cites several interrogatory responses (APWU/USPS-T2-13, OCA/USPS-T2-18, and APWU/USPS-T2-15) that refer to the AMP Public Input process and the development of related documents. Final versions of each document were transmitted to undersigned counsel for review today. Copies will be filed in a Library Reference no later than June 23rd.

The second full paragraph of page 2 of the APWU motion refers to two RDC-related documents: a planning concept document and a communications plan. Drafts of both documents are currently in the advanced stages of their respective internal document clearance review processes. Final clearance could be imminent in each instance. The Postal Service expects to have more definitive information to report no later than June 23rd.

Drafts of the following overdue interrogatory responses are undergoing final review and are expected to be filed no later than June 23rd: APMU/USPS-T1-6,

APWU/USPS-T1-9; APWU/USPS-T1-31; APWU/USPS-T1-32; APWU/USPS-T2-84 through 89, DBP/USPS-61; DBP/USPS-75; and OCA/USPS-T1-21(d).

Draft responses to the bulk of POIR 4 Question 7 are in production. An updated status report will be filed no later than June 23rd.

Internal consultations regarding the contents of the document responsive to OCA/USPS-48 are not expected to be concluded until June 29th. Accordingly, a response to that interrogatory is not expected to be filed until that date or the next day.

The Postal Service continues to determine how to produce information responsive to DBP/USPS-60.

Otherwise, the Postal Service also is diligently working to prepare responses to other discovery responses whose due dates have not yet arrived.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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