

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

REPLY OF THE UNITED STATES POSTAL SERVICE TO MOTION
OF AMERICAN POSTAL WORKERS UNION SEEKING EXTENSION OF DISCOVERY
(June 30, 2006)

The United States Postal Service hereby replies to the June 16, 2006, motion of the American Postal Workers Union seeking an extension of discovery in this docket.

The Postal Service defers to the Commission's judgment on the merits of the APWU motion. Should the Commission conclude that an extension of discovery is appropriate, the Commission might also deem it necessary to postpone the hearings currently scheduled to begin on July 18th, 2006. If the Commission makes this latter determination, the Postal Service respectfully suggests that the Commission take into consideration that the Postal Service's witnesses both have conflicts which make it imperative that hearings not be re-scheduled to occur before September 6, 2006.

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