

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 INTERROGATORY RESPONSES  
NNA/USPS-T5-1-2

The United States Postal Service hereby moves for late acceptance of the responses of witness Riddle to interrogatories of the National Newspaper Association. The responses are being filed two business days late. Witness Riddle completed the responses well in advance of the due date. Unfortunately, counsel did not manage to keep them queued for filing as he gathered other materials that permit him to continue operating as a Postal Service attorney while traveling to New Orleans and thence to Minneapolis. As such, the undersigned counsel is the sole cause of the delay. The responses are being filed thanks to the good graces of the office of the Minneapolis postmaster.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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July 7, 2006