

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR SUBSTITUTION OF INSTITUTIONAL INTERROGATORY RESPONSES  
IN THE TRANSCRIPT (DBP/USPS-340 AND 341; Tr. 18C/5975-76)

The United States Postal Service hereby moves for inclusion of its revised responses to the following institutional interrogatories in the evidentiary record: DBP/USPS-340 and 341. The original responses were filed on August 7, 2006, and appear in the evidentiary record at Tr. 18C/5975-76.

In certain respects, the original responses to these interrogatories explicitly have been superseded by subsequent related interrogatory responses. Nevertheless, the continued inclusion of the original responses to DBP/USPS-340 and 341 appears to be creating confusion and generating discovery that may not be necessary. To minimize further confusion and further unnecessary discovery, the Postal Service proposes that the original responses, cited above, be stricken from the record, and that the revised responses filed today be included in the next transcript volume of designated institutional Postal Service interrogatory responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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