

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

RATE AND SERVICE CHANGES TO IMPLEMENT
BASELINE NEGOTIATED SERVICE AGREEMENT
WITH BANK OF AMERICA CORPORATION

Docket No. MC2007-1

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LEAVE TO FILE RESPONSES TO INTERROGATORIES
OCA/USPS-T1-5-9, 11-12 AND 13-16, AND 17, PARTS (A)-(D) OUT OF TIME
(March 9, 2007)**

The United States Postal Service hereby moves that its responses to interrogatories OCA/USPS-T1-5-9, 11-12 and 13-16, and 17, parts (a)-(d) be accepted out of time. The Postal Service's response to interrogatories OCA/USPS-T1-5-9, 11-12 was due on March 6, 2007. The Postal Service's response to interrogatories OCA/USPS-T1-13-16, and 17, parts (a)-(d) was due on March 8, 2007. The delays were caused by a variety of factors, including unanticipated problems in coordinating the response among several functional organizations, and technical problems with the electronic messaging network at the Postal Service which caused significant delays in the exchange of documents between functional organizations. Given the nature of the inquiries and the current posture of the case, the Postal Service does not believe any party has been prejudiced by the delay of three days, and one day, respectively.

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel, Customer Programs

Frank R. Heselton
Matthew J. Connolly

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1135
(202) 268-8582; Fax -5418

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Matthew J. Connolly

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1135
(202) 268-8582; Fax -5418
March 9, 2007