

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 RESPONSE TO INTERROGATORIES
OCA/USPS-T1-36 AND 39 OUT OF TIME**
(April 6, 2007)

The United States Postal Service hereby moves that its response to interrogatories OCA/USPS-T1-36 and 39 be accepted out of time. The Postal Service's response to those interrogatories was due on March 23, 2007. The delay was caused by a variety of factors, including the need to coordinate the response among several functional organizations. Given the nature of the inquiry and the current posture of the case, the Postal Service does not believe any party has been prejudiced by the delay. The Postal Service's response to OCA/USPS-T1-35 and 37 will be forthcoming.

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
April 6, 2007