

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 AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO COMPEL UNITED STATES POSTAL SERVICE TO ANSWER  
INTERROGATORY APWU/USPS-T1-1  
(April 24, 2007)**

Pursuant to Rule 26(e) of the Rules of Practice, the American Postal Workers Union, AFL-CIO (APWU) hereby respectfully moves the Postal Regulatory Commission to enter an order compelling the United States Postal Service (USPS) to answer Interrogatory APWU/USPS-T1-1.

Under the current rules of practice before the Commission answers to interrogatories must be provided within 14 days of the filing of the interrogatories. Rule 26(b). Objections to interrogatories must be filed within 10 days after the interrogatories were filed.

On March 27, 2007 the APWU propounded Interrogatories APWU/USPS-T1-3. The Postal Service response to these interrogatories was due no later than April 10, 2007. On April 13, 2007, three days late, the Postal Service filed responses to APWU/USPS-T1-2-3. These responses were accompanied by a Motion for Late Acceptance by the Postal Service. This Motion stated that "the Postal Service's response to APWU/USPS-T1-1 will be forthcoming." To date, no response has been filed by the Postal Service. The response is now two weeks past due and the Postal

Service has provided no indication when or if it intends to produce this information. Production of the information requested is necessary because, without the requested information, the proposed NSA cannot be approved. Therefore, the Postal Service must be compelled to respond to this interrogatory immediately.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO