

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF FILING OF RESPONSES TO
AMERICAN POSTAL WORKERS UNION INTERROGATORIES
APWU/USPS-T2-1, 2, 3(d,e), 4-7 AND 9
(August 12, 2009)

The United States Postal Service hereby moves for late acceptance of its filing today of the following interrogatory responses due to have been filed one calendar day/one business day ago on July 11, 2009: APWU/USPS-T2-1, 2, 3(d,e) 4-7 and 9. Internal review of the responses by all internal stakeholders could not be completed in time for assembly of the electronic filing by the 4:30pm deadline yesterday. The Postal Service regrets the delay, but believes that any prejudice to the parties is minimized by the filing of the responses first thing this morning.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:
Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product Support

Michael T. Tidwell
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
michael.t.tidwell@usps.gov