

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

COMPLAINT OF GAMEFLY, INC.)
)
) Docket No. C2009-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF ITS RESPONSES
TO GFL/USPS-97, 110, 133, 141, AND 162
(October 22, 2009)

The Postal Service hereby moves for the late acceptance of its responses to the following discovery requests of GameFly, Inc.: GFL/USPS-97, 110, 133, 141, and 162. These responses were due on October 2, 2009. The Postal Service was unable to provide responses to these institutional discovery requests within the 14-day timeframe established by the Commission's rules for a number of reasons. These include the large number of discovery requests that have been submitted by GameFly, and the extensive cross-functional consultation that is required to answer these questions. This cross-functional consultation is further complicated by the fact that, unlike a proceeding in which discovery is directed to Postal Service witnesses whose jobs are largely or entirely dedicated to providing litigation support, these are institutional questions, implicating a large number of employees whose ability to focus on these issues is inherently limited. The number of employees that must be consulted is further increased by the fact that these questions often seek details into events that occurred years ago. Finally, the Postal Service's ability to respond timely was further delayed by the press of other business in this and other proceedings. The Postal Service

regrets the delay, and wishes to assure the Commission, and all interested parties, that it is attempting to adhere to applicable discovery deadlines as diligently as possible, given current resources.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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