Postal Regulatory Commission
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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-145 AND 161
(October 27, 2009)

The Postal Service hereby moves for the late acceptance of its responses to the following discovery requests of GameFly, Inc.: GFL/USPS-145 and 161.[1] 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 extensive cross-functional consultation that was required to answer these questions, complicated by the need to also work on the large number of discovery requests that have also been submitted by GameFly. This consultation was further complicated by the fact that these questions inquire into events that occurred a number of 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.

[1] The Postal Service also today filed responses to GFL/USPS-109 and 151. These interrogatories were originally objected to, but those objections were withdrawn on October 20, 2009.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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