

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

In the Matter of:
University Station
Eugene, Oregon 97403
(Steven Shapiro, Petitioner)

Docket No. A2011-4

**MOTION FOR LATE ACCEPTANCE OF SUPPLEMENTAL COMMENTS OF
AMERICAN POSTAL WORKERS UNION, AFL-CIO
EUGENE AREA LOCAL NO. 679
(March 15, 2011)**

The American Postal Workers Union, AFL-CIO, Eugene Area Local No. 679 (Local or Union) moves for late acceptance of its Supplemental Comments filed in response to the Administrative Record filed in this case. On January 26, 2011 we filed a Motion to Compel the Administrative Record and an opportunity to file comments in response to the Record. This Motion was subsequently granted on March 2, 2011, and the Commission ordered the Postal Service to produce the Record by March 7, 2011 with Comments on the filing accepted until March 11, 2011, four business days later.

On March 7, 2011 the Postal Service filed a Notice of Filing the Administrative Record and a Request for Protective Conditions. A public version of the Administrative Record became available on March 8, 2011.

The Union attempted to review and respond to the material contained in the Record timely, but given the already tight turn around required of comments on the Record, the delay in posting of the public version of the Record by one day made it impossible to meet the March 11, 2011 deadline. Subsequently, we tried to file our Supplemental Comments on Monday, March 14, 2011, which was within four working days of when the Record became available. However, attempts to file the Supplemental Comments online were met with numerous error messages from the PRC's online filing system. Unfortunately, the filing error was unable to be resolved in time for the Supplemental Comments to post that day.

The Supplemental Comments are now being filed today, Tuesday, March 15, 2011. As the delay was caused by factors out of the Local's control we ask that our Motion for Late Acceptance be granted. Furthermore, no party should be prejudiced by this delay since there is no opportunity for additional filings in the procedural schedule.

Respectfully submitted,

Jim Kubli
President, Eugene Area Local No. 679