

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

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF FILING OF RESPONSES TO INTERROGATORIES
APWU/USPS-T1-1 AND T1-3 THROUGH 5**

The United States Postal Service hereby moves for late acceptance of the filing of responses to the following August 15, 2011, American Postal Workers Union interrogatories: APWU/USPS-T1-1 and T1-3 through 5. The responses were due yesterday, one calendar days ago. While filing related objections to interrogatories at 4:17pm, counsel became distracted by a telephone call and neglected to hit the all-important *Submit* button to file the completed interrogatory responses, an oversight not discovered until several hours after the 4:30pm filing deadline. To mitigate any prejudice resulting from the responses not being filed until this morning, undersigned counsel e-mailed copies to APWU counsel within minutes of discovering the oversight. The Postal Service regrets the delay, but believes that any prejudice is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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