

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF
RESPONSES BY UNITED STATES POSTAL SERVICE WITNESSES TO PRESIDING
OFFICER'S INFORMATION REQUEST NO. 1**
(January 13, 2012)

The United States Postal Service hereby moves for late acceptance of the filing of various responses. This particular motion is triggered by the need to file late responses to questions 17, 18(a), and 19-20 on behalf of witness Elmore-Yalch. However, it appears that some previously filed responses to POIR1 were also filed late without being accompanied by motions for late acceptance, including questions 2 and 9-12, . Responses to all of the questions were worked diligently from the time the POIR was first filed; the time needed to complete the responses owed to the complexity of certain questions and to the need for (sometimes extensive) cross-functional coordination. The fact that certain responses remain outstanding bespeaks the challenge the POIR presents. Today's responses are being filed four days late. The Postal Service regrets the delays, but believes that any prejudice is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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