

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

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF
RESPONSE TO INTERROGATORY OF
THE AMERICAN POSTAL WORKERS UNION, AFL-CIO (APWU/USPS-T6-2)**
(March 19, 2012)

The United States Postal Service hereby moves for late acceptance of the Response of United States Postal Service to Interrogatory of the American Postal Workers Union, AFL-CIO (APWU/USPS-T6-2), filed on January 27, 2012. According to the Postal Regulatory Commission's rules, the response was due on February 10, 2012.

Interrogatory APWU/USPS-T6-2 asked the Postal Service to produce postal forms associated with eighty (80) Highway Contract Route identification numbers. Because these forms are not centrally located, the Postal Service was required to search several field offices to obtain any and all responsive documentation, thereby resulting in a delay in the Postal Service's response. The press of business including that of PRC Docket No. N2012-1 and other important postal business also contributed to the delay.

Additionally, several documents contained within the library reference supporting the response to APWU/USPS-T6-2 (USPS-LR-N2012-1/72) contain pages that are not legible. Postal Service headquarters is working with

employees in the relevant area and district offices to obtain legible copies of all available documents. To minimize any prejudice to the parties in this docket caused by further delay in the production of legible copies, the Postal Service is today filing all available, responsive documents in their present state, including any pages that currently are illegible. As expeditiously as possible, the Postal Service will update the library reference to substitute the illegible pages with legible copies.

The Postal Service regrets the delay in filing this response but believes that any prejudice is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 19, 2012