

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

RATE AND SERVICE CHANGES TO IMPLEMENT
BASELINE NEGOTIATED SERVICE AGREEMENT
WITH BOOKSPAN

Docket No. MC2005-3

**MOTION FOR LATE ACCEPTANCE OF RESPONSE OF THE
UNITED STATES POSTAL SERVICE TO INTERROGATORY OCA/USPS-T2-22
(November 21, 2005)**

The United States Postal Service hereby moves that its response to interrogatory OCA/USPS-T2-22 be accepted late. The delay was caused by an apparent oversight at the time it was due, followed by counsel's subsequent absence from the office on sick leave until today. The Postal Service regrets the delay. Given the nature of the question the Postal Service does not believe the delay in any way inconvenienced the OCA, the Commission or any other participant.¹

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Scott L. Reiter

¹ In fact, the OCA waited to bring the missing answer to the attention of the Postal Service until filing on November 18 a motion to keep the record open on the grounds of the missing interrogatory answer. It is unfortunate that the OCA did not first attempt to contact the Postal Service informally, as the Commission encourages participants to do, to inquire about the answer, before initiating further motion practice. The answer, which was prepared, but not filed, could have been filed immediately following such an inquiry by the OCA, thereby avoiding the need for the motion, which the Postal Service will answer shortly.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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