

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 THE  
RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OCA/USPS-T2-25 REDIRECTED FROM WITNESS YORGEY**

The United States Postal Service hereby moves that its response to interrogatory OCA/USPS-T2-25 be accepted late. The original due date of this response was yesterday, but that was shortened to November 28 by Presiding Officer's Ruling No. MC2005-3/18. Unfortunately, due to undersigned counsel's absences—anticipated and unanticipated—from the office, and the vagaries of remote computer technology, that deadline was missed.

The Postal Service recognizes that the deadline was set in order to accommodate the expedited briefing schedule, and appreciates the Presiding Officer's efforts in this regard. If further follow up to, or other clarification of, the response is requested, the Postal Service will work informally with the OCA,<sup>1</sup> and any other

---

<sup>1</sup> The OCA has indicated to the Postal Service its agreement to attempt to resolve any matters raised by the late filing informally and on an expedited basis.

interested participant , to expedite the process in order maintain the briefing schedule set by the Presiding Officer, if at all possible.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

Scott L. Reiter

### **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.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2999, Fax -5402  
[scott.l.reiter@usps.gov](mailto:scott.l.reiter@usps.gov)  
December 1, 2005