

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE
OF RESPONSES TO INTERROGATORIES (OCA/USPS-17 THROUGH 26)
(April 11, 2006)

The United States Postal Service hereby moves for late acceptance of the filing of its responses to the following interrogatories identified below.

OCA/USPS-17 through 22: These responses were due to have been filed on April 4th, but were not filed until April 10th, 6 calendar days late. In the past two weeks, personnel with the responsibility for reviewing AMP proposals and for helping to clear the backlog of interrogatory responses resulting from the absence of colleagues described in the Postal Service's March 24, 2006, Motion for Late Acceptance, worked as diligently as possible to complete all necessary consultations and prepare responses for filing on Friday, April 7th, 3 days late. However, as the document transmitting the responses was being prepared for filing on that day, an inexplicable technical problem arose during the conversion of a PowerPoint document responsive to OCA/USPS-20 to PDF format. That problem ultimately required the intervention of technical support staff on the 7th, but could not be resolved that day, causing the filing to be delayed until Monday, April 10th.

The Postal Service regrets the delay and leaves it to other parties to assess the degree to which any material prejudice has resulted.

OCA/USPS-23 through 26: These responses were due to have been filed on April 6th, but were not filed until April 7th, 1 calendar day late. In the past two weeks, personnel with the primary responsibility for reviewing AMP proposals and helping to clear the aforementioned backlog of interrogatory responses could not complete all necessary consultations in time to ensure the timely filing of these responses until one day after they were due. The Postal Service regrets this delay, but regards any prejudice to be *de minimis*.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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