

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF  
ITS RESPONSE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY  
REDIRECTED FROM WITNESS WILLIAMS  
(APWU/USPS-T2-98)

The United States Postal Service hereby moves for late acceptance of its institutional response to interrogatory APWU/USPS-T2-98, which was originally directed to witness Williams. The response was due to have been filed on June 30, 2006 – 11 calendar days ago. Preparation of the response required an exhaustive search of correspondence files in various headquarters and field offices that could not be completed until yesterday. Accordingly, the response could not be filed until today. The Postal Service regrets the delay, but considers that no party has been prejudiced by it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel, Ratemaking

---

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
[michael.t.tidwell@usps.gov](mailto:michael.t.tidwell@usps.gov)  
July 11, 2006