

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

MOTION FOR LATE ACCEPTANCE OF  
OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
DAVID B. POPKIN INTERROGATORY TO  
THE UNITED STATES POSTAL SERVICE (DBP/USPS-288)  
(July 27, 2006)

The Postal Service hereby moves for late acceptance for its objection to interrogatory DBP/USPS-288. The interrogatory was filed as part of a large number of interrogatories by Mr. Popkin on the last day for discovery regarding the Postal Service direct case on July 14, 2006. It was just brought to the attention of the undersigned counsel, who served as lead counsel in the docket that led to the Premium Forwarding Service Experiment, Docket No. MC2005-1. While Mr. Popkin has forayed far and long into postal matters, his venture to Premium Forwarding Service on the last day of discovery should not be tolerated. With the flurry of pleadings now being filed, little prejudice is likely to flow from filing this objection two days late.

Wherefore, the Postal Service moves for late acceptance of its objection to DBP/USPS-288.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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