

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION FOR LATE ACCEPTANCE OF
RESPONSES OF POSTAL SERVICE WITNESS BERKELEY
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39—48, 51, AND 53)

The United States Postal Service hereby moves for acceptance, 16 business days late, of the responses of witness Berkeley (USPS-T-39) to the above-listed interrogatories, filed on July 14, 2006. The delay resulted from the need to work with different functions within the Postal Service, and the workload related to hearings.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187
August 21, 2006