

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE
OF RESPONSES TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-54, 56-59, 64-66, 68)**

The United States Postal Service hereby moves for late acceptance of its responses to the following interrogatories of Douglas F. Carlson:

DFC /USPS-54, 56, and 57, filed on July 26, 2006; and

DFC /USPS-58, 59, 64, 65, 66, 68, filed on July 28, 2006.

The delay was caused by the need to consult with various functional groups, the need to revise draft answers following the revision of footnote 2 in USPS-T-38, and by discussions between undersigned counsel and Mr. Carlson to reach agreement on which interrogatories were moot and need not be answered, following that revision. The Postal Service does not believe any party will be prejudiced by the delay, and notes that it has today filed early responses to DFC/USPS-T38-15-18 on the same subject.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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August 21, 2006