

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

COMPLAINT OF CAPITAL ONE SERVICES, INC.

Docket No. C2008-3

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF RESPONSES TO INTERROGATORIES
OF VALPAK DIRECT MARKETING SYSTEMS, INC.
AND VALPAK DEALERS' ASSOCIATION, INC.
(VP/USPS-5-11)
(April 27, 2009)**

The United States Postal Service hereby moves for late acceptance of its responses to VP/USPS-5-11, which was filed on October 10, 2008. These responses were due on October 24, 2008. The responses to the instant interrogatories were delayed because of the need to seek input from a number of individuals not normally focused on this docket. Additionally, the press of other business for those individuals contributed to the delay. Throughout this process, the Postal Service and Capital One have engaged in extensive discussions regarding the scope of discovery in this docket, which required, and continues to require, a significant investment of internal postal resources. These discussions, and the work involved in electronic document discovery in this case, also contributed to the delay in response. The Postal Service regrets the delay, but does not believe that any party has been materially prejudiced by it, given the procedural posture of the instant docket over the last several months while the parties

have been resolving discovery issues informally. Accordingly, the Postal Service respectfully moves for late acceptance of its responses to VP/USPS-5-11.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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April 27, 2009