

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

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POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

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Docket No. R2005-1

MOTION FOR LATE ACCEPTANCE OF RESPONSES OF UNITED STATES POSTAL  
SERVICE WITNESS ABDIRAHMAN TO INTERROGATORIES OF AMERICAN  
BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF PRESORT MAILERS  
(ABA&NAPM/USPS-T21-20 b and c, 22-26, 27 a, 28-29, 31-32)

The United States Postal Service hereby moves for late acceptance of the responses of witness Abdirahman to the above-listed interrogatories of the American Bankers Association and the National Association of Presort Mailers, filed on May 11 and due on May 25, 2005. The delay of two business days was due to the need to consult with the multiple witnesses who sponsor the library references cited in the questions.

Whereas no one was prejudiced by the short delay, the Postal Service respectfully requests that the motion for late acceptance be granted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Nan K. McKenzie  
Attorney

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ABDIRAHMAN TO  
INTERROGATORY OF MAJOR MAILERS ASSOCIATION

(202) 268-3089; Fax -5402  
May 27, 2005

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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Nan K. McKenzie

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
May 27, 2005