

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

POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS MOTION FOR LEAVE TO FILE
ONE DAY LATE
FOLLOW-UP INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ALTAH H. TAUFIQUE (ABA&NAPM/USPS-T28-3-5)
(June 22, 2005)

The American Bankers Association and the National Association of Presort Mailers hereby file this Motion for Leave to File One Day Late joint follow-up interrogatories and document production requests to witness Taufique (USPS-T28) concerning his response to POIR 6, question # 7 filed by him on June 14, 2005.

These follow-up interrogatories were due on June 21, 2005; and we attempted to file these interrogatories electronically at around 4 p.m. on June 21, 2005 with the Commission. Shortly thereafter on June 21, 2005 we received a call from the Commission Docket Room explaining that we had not complied with a technicality of the electronic filing process which requires the interrogatory questions and the excel sheet attachments to be combined into a pdf document. We then sent a courtesy copy of these interrogatories and attachment to Postal Service counsel, Michael Tidwell at 5:10 p.m. on June 21, 2005, and now seek leave to file these interrogatories and attachment today, one day late.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
NATIONAL ASSOCIATION OF PRESORT MAILERS

Henry A. Hart, Esq.
Reed Smith LLP
1301 K Street N.W.
Suite 1100 - East Tower
Washington, DC 20005
Ph: 202-414-9225
Fax: 202-414-9299
Counsel for National Association
of Presort Mailers

Irving D. Warden
Assoc. General Counsel
American Bankers Association
1120 Connecticut Ave., NW
Washington, DC 20036
Ph: 202-663-5027
Fax: 202-828-4548
Counsel for American Bankers
Association