

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

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

Docket No. R2005-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF
THE RESPONSES OF POSTAL SERVICE WITNESS SMITH
TO INTERROGATORY OF ABA&NAPM,
REDIRECTED FROM WITNESS ABDIRAHMAN
[ABA&NAPM/USPS-T21-59.a]
(June 28, 2005)

The United States Postal Service hereby moves for late acceptance of the response of witness Smith to the above-listed interrogatory of American Bankers Association and National Association of Presort Mailers, filed on June 9, 2005.

The brief delay was caused by the workload of the witness. No party is likely to be prejudiced.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, Fax -5402

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, FAX: -5402
June 28, 2005