

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Evolutionary Network Development )  
Service Changes, 2006 )  

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Docket No. N2006-1

**MOTION OF AMERICAN POSTAL WORKERS UNION, AFL-CIO, TO REPLACE  
MOTION OF APWU TO COMPEL USPS TO ANSWER INTERROGATORIES  
APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k), and 8 and APWU/USPS-T1-9  
AND TREAT REPLACEMENT AS FILED ON FEBRUARY 28, 2006  
(March 1, 2006)**

The American Postal Workers Union, AFL-CIO (APWU), hereby respectfully moves the Postal Rate Commission to replace the Motion to Compel United States Postal Service to Answer Interrogatories APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k) and 8 and APWU/USPS-T1-9 filed on February 28, 2006.

In order to facilitate the Postal Rate Commission's electronic filing system the February 28, 2006 Motion to Compel has been bifurcated into two separate Motions: Motion of American Postal Workers Union, AFL-CIO, to Compel United States Postal Service to Answer Interrogatories APWU/USPS-T1-9; and Motion of American Postal Workers Union, AFL-CIO, to Compel United States Postal Service to Answer Interrogatories APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k), and 8.

The American Postal Workers Union, AFL-CIO respectfully requests that the Commission replace the original Motion to Compel with the bifurcated Motions and accept them as filed on February 28, 2006.

Respectfully submitted,

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Darryl J. Anderson  
Counsel for American Postal Workers Union, AFL-CIO

O'Donnell, Schwartz & Anderson, P.C.  
1300 L Street NW Suite 1200  
Washington, DC 20005-4126  
Voice: (202) 898-1707  
Fax: (202) 682-9276  
Danderson@odsalaw.com