

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE  
OF RESPONSES OF WITNESS WILLIAMS TO INTERROGATORIES  
(OCA/USPS-T2-2 AND 4 THROUGH 16)  
(April 11, 2006)

The United States Postal Service hereby moves for late acceptance of the filing of its responses to the following interrogatories identified below.

OCA/USPS-T2-2: Due on March 20<sup>th</sup>, this response was filed on April 7<sup>th</sup>, 18 calendar days late. With regard to this interrogatory, the Postal Service incorporates by reference the explanation offered in its March 24, 2006, motion for late acceptance. The unavoidable absence of critical personnel, as described in that pleading, made the timely production, review and filing of this response, and a host of others, impossible. Consultations necessary for the completion of a response to this particular interrogatory could not be completed until all necessary employees were back in the office and able to direct their undivided attention to the task.

OCA/USPS-T2-4 through 6: These responses were due to have been filed on April 4<sup>th</sup>, but were not filed until April 7<sup>th</sup>, 3 calendar days late. In the past two weeks, personnel with the primary responsibility for reviewing AMP proposals and helping to clear the existing backlog of interrogatory responses could not complete all necessary consultations in time to ensure timely production, review and filing of these particular responses. As a result, the responses were three days late.

OCA/USPS-T2-7 through 16: These responses were due to have been filed on April 4th, but were not filed until April 7<sup>th</sup>, 3 calendar days late. In the past two weeks, personnel with the primary responsibility for reviewing AMP proposals and helping to clear the aforementioned backlog of interrogatory responses could not complete all necessary consultations in time to ensure the timely filing of these responses. As a result, these responses were filed three days late.

The Postal Service regrets the disruption to the progress of this docket caused by the delay in the production of responses to these interrogatories and defers to others on the question of whether this delay has prejudiced any party.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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