

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
(APWU/USPS-T2-13 THROUGH 19, 22 AND 23, AND 34 THROUGH 46)
(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.

APWU/USPS-T2-13 through 19, 22 and 23: These responses were due to have been filed on April 6th, but were not filed until April 7th, 1 calendar day late. In the past two weeks, personnel with the primary responsibility for reviewing AMP proposals and helping to clear the current 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 one day late.

APWU/USPS-T2-34 through 46: These responses were due to have been filed on April 6th, but were not filed until April 11th, 5 calendar days late. Despite their diligence, the aforementioned personnel could not complete all necessary consultations in time to ensure the filing of these particular responses until late yesterday. As a consequence, the responses were not filed until today.

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

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402
michael.t.tidwell@usps.gov
April 11, 2006