

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 SHAH TO INTERROGATORIES  
(OCA/USPS-T1-10, 19 AND 20)  
(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-T1-10: This response was due to have been filed on March 23<sup>rd</sup>, but were not filed until April 10th, 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, created a backlog that made the timely production, review and filing of these particular responses impossible.

OCA/USPS-T1-19 and 20: 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 timely production, review and filing of these particular responses.

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](mailto:michael.t.tidwell@usps.gov)  
April 11, 2006