

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 ITS RESPONSES TO INTERROGATORIES (OCA/USPS-T1-9 AND 11)
(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-T1-9 and 11: These responses were due to have been filed on March 22nd, but were not filed until April 10th, 19 calendar days late. With regard to these interrogatories, 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.

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