

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 FILING OF RESPONSES OF WITNESS WILLIAMS
TO OCA INTERROGATORIES (OCA/USPS-T2-35 THROUGH 43)
(June 1, 2006)

The United States Postal Service hereby moves that the Commission accept for late filing the responses of witness Williams to the following interrogatories:

APWU/USPS-T2-35 through 43.

The response to APWU/USPS-T2-35 was due to have been filed ten calendar days ago, on May 22, 2006. A miscommunication regarding the responsibility for the preparation of the response resulted in the delay.

The responses to the remaining interrogatories were due to have been filed yesterday. The compilation of responsive information and consultations necessary for the completion of the responses could not be concluded until earlier today.

The Postal Service regrets the delay in each instance, but considers that any prejudice to the parties is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
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
June 1, 2006