

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

COMPLAINT ON STAMPED STATIONERY

Docket No. C2004-3

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF REPLY BRIEF**
(July 10, 2006)

In the process of accessing a document on the Commission's website in this docket, undersigned counsel observed that the Postal Service's reply brief does not appear as having been filed. Given that counsel prepared a final version of the reply brief on the appropriate date and intended to file it on the day, the only plausible explanation for the absence of the document, in light of the demonstrated diligence of the Commission's Dockets section, must be counsel's advancing age and the press of other business.

Despite the embarrassing nature of this discovery, it is fortunate that counsel's oversight has no potential to prejudice the interests of other participants, since this was the final filing in this docket. It is the Commission, however, for whom this tardiness has the potential of creating a burden. The Postal Service believes that the points raised in its reply brief will be helpful to the Commission in considering the arguments in this docket, but understands if the timing is problematic at this point. With the hope that the

reply brief can be accepted late without creating undue difficulty for the Commission, the Postal Service asks the Commission to do so. The document has been re-dated to reflect today's date.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
Scott.L.Reiter@usps.gov
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