

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION FOR LATE ACCEPTANCE OF THE
RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-264, 269-270, 293-364, 418, 488-518 AND 568)
(September 12, 2006)

The United States Postal Service hereby moves for late acceptance of its institutional responses to interrogatories DBP/USPS-264, 269-270, 293-364, 418, 488-518, and 568. Mr. Popkin identified these interrogatories (except for DBP/USPS-264 and 568) as being filed late without an accompanying motion for late acceptance in his "Motion to Require the Postal Service to File Motions for Late Acceptance of Interrogatory Responses," filed on September 5, 2006. The failure of the Postal Service to file motions for late acceptance of these interrogatories was inadvertent, and was caused by the press of other business. The Postal Service regrets the oversight, but does not feel that any party has been prejudiced.

The Postal Service moves that the Commission accept these late-filed responses. The responses to DBP/USPS-269, 270, and 418 were delayed due to simple oversight, caused by the press of other business in both this Docket and other Dockets on the part of the attorney assigned to file answers. The responses to DBP/USPS-264, 293-364, and 488-518 were delayed due to the

need for extensive consultations across Postal Service functional areas. The Postal Service regrets the delays involved.

Finally, the response to DBP/USPS-568 was filed today, one day late. The discovery of an error in the cover page of the response resulted in a correction being made that could not be executed in time to meet yesterday's filing deadline. The Postal Service believes that no prejudice will result from the delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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