

The Postal Service duly filed its first set of data on October 16 (USPS-LR-L-189). Because LR-L-189 was filed under protective conditions, Time Warner was unable to provide the data to its consultant, Halstein Stralberg before the evening of October 18. Mr. Stralberg anticipated that analysis of those data could not be completed in time to allow filing before October 25, two days out of time. However, on October 23 the Postal Service filed a revised version of LR-L-189 containing additional data, which it stated to be "a complete response to the request in Presiding Officer's Information Request No. 19."²

The provision of a complete data set on October 23 appeared to obviate the purpose of filing an analysis of the partial data set that had been filed on October 16, and Time Warner at that time anticipated filing its analysis of the complete data set no later than October 30. However, problems with the data set filed on October 23 necessitated two further revisions of LR-L-189 by the Postal Service, making the completion of Time Warner's analysis impossible until the instant date, two days subsequent to the Postal Service's filing of its latest revision to LR-L-189.³

Wherefore, Time Warner respectfully moves for late acceptance of its response to POIR No. 19. Time Warner believes that granting this motion will not prejudice the interests of any other participant.

² Notice of the United States Postal Service of Filing of Second Revised Version of Library Reference USPS-LR-L-189 [Errata] **Protected Material**, filed October 23, 2006, at 1.

³ Notice of the United States Postal Service of Filing Of Fourth Revised Version of Library Reference USPS-LR-L-189 [Errata] **Protected Material**, filed October 31, 2006.

Respectfully submitted,

s/ _____
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