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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

EXPERIMENTAL RATE AND SERVICE CHANGES TO
IMPLEMENT NEGOTIATED SERVICE AGREEMENT WITH
Capital One Services, Inc.

Docket No. MC2002-2

MOTION FOR LEAVE TO FILE UNAUTHORIZED PLEADING

The Association for Postal Commerce (PostCom) and the Mailing & Fulfillment Services Association (MFSA) seek leave to file the "PostCom/MFSA Response to NAA" that is submitted with this pleading. The schedule inviting comment by participants on certain threshold issues raised by the Postal Service request for a recommended decision that inaugurated this proceeding, Notice and Order on Filing of Request for Establishment of Experimental Rate and Service Changes for Qualifying First-Class Mailings at 8, paragraphs 5 & 6 (Order No. 1346) made no provision for pleadings responsive to the submissions made by other participants on or before October 17. PostCom and MFSA seek leave to rejoin briefly to the October 17 pleading filed for the Newspaper Association of America, Comments of the Newspaper Association of America on Order No. 1346 (the "NAA 1346 Pleading").

PostCom and MFSA submit that neither any participant nor the preliminary schedule established in Order No. 1346 will be inappropriately burdened by the

Commission's acceptance of the PostCom/MFSA comments on the NAA 1346
Pleading.

Respectfully submitted,



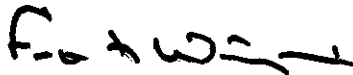
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October 21, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the rules of practice.



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