

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

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: Docket No. R2005-1
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MOTION OF ADVO INC. FOR ACCEPTANCE OF LATE-FILED RESPONSES TO
INTERROGATORIES OF VALPAK (VP/ADVO-1-6)

(August 22, 2005)

ADVO, Inc. (Advo) hereby moves for late acceptance of its responses to Valpak interrogatories VP/ADVO-1-6.

These interrogatories, filed at the close of business on Friday, July 29, 2005, sought extensive information from Advo and its subsidiaries as well as fourteen (14) other independent companies concerning their mailing practices and historical volumes, including detailed breakouts of those volumes. In addition to their breadth, the timing of these interrogatories, coming in the midst of discovery on Valpak's direct testimony and at the height of the summer vacation season for key employees, has complicated the task of gathering the sought information, particularly for a number of the smaller companies that have limited staffing, and has required a substantial amount of counsel's time to explain and coordinate the data collection effort.

These responses are being filed late by agreement with counsel for Valpak.

Respectfully submitted,

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