

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
LEAVE TO REPLY TO VALPAK'S
OPPOSITION TO THE POSTAL SERVICES'S MOTION FOR
WAIVER REGARDING ITS LIBRARY REFERENCES
(June 9, 2006)

The United States Postal Service hereby requests leave to reply to Valpak's Opposition to the Postal Service's Motion Requesting Waiver of the Commission Rules with Respect to Category 1, 2, 3, and 5 Library References, filed on June 5, 2006 ("Opposition"). The Motion for Waiver that Valpak is opposing is that filed by the Postal Service on May 3, 2006, along with the rest of the materials submitted on that date to initiate this proceeding. Under Commission Rule 21 regarding motions, no reply to an answer to a motion is authorized without leave. For the reasons set forth below, the Postal Service hereby seeks leave to reply to Valpak's answer in opposition.

The motion filed by the Postal Service requesting waiver (to the extent necessary) of the library reference rules was similar to motions requesting the same relief in previous omnibus rate cases, and was therefore a fairly general document. It focused broadly on the four categories of library references encompassed by the 132 library references submitted with the Postal Service filing. Although the opposition filed by Valpak also contains some broad discussion of the intended application of the library reference rules in the abstract, it can fairly be characterized as a vehicle by which Valpak is attempting to elevate its concerns about two library references in particular.

Obviously, without any basis to anticipate the minimal number of references on which Valpak would focus, the Postal Service has had no opportunity to address in any detail the types of issues raised in Valpak's Opposition. Moreover, in making its arguments in opposition, Valpak has included numerous misstatements of fact, which merit correction. For those reasons, therefore, the Postal Service requests leave to file a reply to Valpak's Opposition. Such a reply is being submitted as a separate pleading.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Eric P. Koetting

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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