

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

POSTAL RATE AND FEE CHANGES,)
2006) Docket No. R2006-1

**MOTION OF
AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
FOR LEAVE TO FILE NOTICE OF JOINT INTERVENTION
OUT OF TIME
(June 12, 2006)**

Pursuant to section 20 of the Commission's Rules of Practice, the American Bankers Association and the National Association of Presort Mailers (collectively "ABA-NAPM") respectfully move for leave to file out of time a notice of their joint intervention as a full participant in this case.

ABA and NAPM previously filed separate notices of intervention on May 4, 2006. While both parties will be conducting their cases separately, both will be working together and conducting joint discovery. Counsel for the two parties were advised by Commission staff today that the filing of a joint notice of notice intervention would be the best way to enable ABA and NAPM to file discovery requests and other pleadings jointly under the Commission's rules for electronic filing of documents.

WHEREFORE, ABA and NAPM respectfully move for leave to file out of time a notice of their joint intervention as a full participant in this case

Respectfully submitted,

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