

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

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POSTAL RATE AND FEE CHANGES, 2006 : Docket No. R2006-1  
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MOTION OF THE UNITED STATES POSTAL SERVICE FOR DEFERRED FILING OF  
FOREVER STAMP TESTIMONY  
(July 14, 2006)

In its Request in this docket, the Postal Service proposed the establishment of a “Forever Stamp” for the basic rate for the first ounce of First-Class Mail letters (USPS-T-32, at 26-27). The Postal Service also requested that the Commission’s filing requirements (39 C.F.R. §§ 3001.54(a), 64(a)) be waived or suspended, pending the filing of supplemental testimony and materials supporting the proposal.<sup>1</sup> At the Prehearing Conference, on June 16, 2006, the Presiding Officer announced that he was inclined to grant the Postal Service’s motion, on the condition that participants be allowed an opportunity to explore late-filed materials, and that hearings could be scheduled for cross-examination, if needed, after the appearance of the Postal Service witnesses testifying on other issues. Tr. 1/44-45.

The Postal Service hereby moves for leave to file additional testimony on the Forever Stamp.<sup>2</sup> Given the nature of the testimony and the unopposed intention of the Presiding Officer to adjust the procedural schedule to accommodate review of the

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<sup>1</sup> Motion of the United States Postal Service for Partial Waiver or Suspension of Commission Rules Specifying Materials to Be Filed in Support of Its Request For Changes in Postal Rates and Classifications, Docket No. R2006-1 (May 3, 2006).

<sup>2</sup> Direct Testimony of Altaf H. Taufique on Behalf of the United States Postal Service, USPS-T-48 (July 14, 2006); Forever Stamp Market Research, USPS-LR-L-152.

proposal, the Postal Service does not believe that any participant will be disadvantaged by filing at this stage of the proceedings. The only parties commenting on the Postal Service's proposal for waiver or suspension supported deferred filing.<sup>3</sup>

UNITED STATES POSTAL SERVICE

By its attorney:

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July 14, 2006  
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<sup>3</sup> Response of the Greeting Card Association in Support of Motion of the United States Postal Service for Partial Waiver or Suspension of Commission Rules Specifying Materials to Be Filed in Support of Its Request for Changes in Postal Rates and Classifications, Docket No. R2006-1, at 2 (May 12, 2006); Office of the Consumer Advocate Response in Support of Postal Service Motion for Partial Waiver, Docket No. R2006-1, at 2-3 (May 17, 2006)