

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

Postal Rate and Fee Changes, 2006

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Docket No. R2006-1

**MOTION OF THE GREETING CARD ASSOCIATION REGARDING SCHEDULING OF
UNITED STATES POSTAL SERVICE'S WITNESSES THRESS AND BERNSTEIN
FOR ORAL CROSS-EXAMINATION
(July 19, 2006)**

The Greeting Card Association requests that witnesses Thress and Bernstein not be scheduled for oral cross-examination on August 2. In its report on availability of witnesses for hearings, the United States Postal Service requested that both witnesses be scheduled for the same day and said that "the best days would be Wednesdays, August 2, 9, or 16."

Cross-examination of these witnesses on August 2 is inconvenient for the Greeting Card Association because (1) we have not yet received responses to interrogatories and document requests to Mr. Bernstein which are numerous and complex, and (2) our expert consultant is out of the country and unavailable before the end of July to assist in the preparation of cross-examination.

We have asked counsel of the other parties who indicated that they plan to cross-examine witness Thress (no other party has indicated that it plans to cross-examine witness Bernstein) whether they object to this request and none has any objection. The parties contacted were: Association for Postal Commerce and the Mailing and Fulfillment Service Association; National Newspaper Association;

Newspaper Association of America; and Valpak Direct Marketing Systems, Inc. and
Valpak Dealers' Association, Inc.

Respectfully submitted,

/s/ James Horwood _____

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Date: July 19, 2006