

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

MOTION OF MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
FOR LEAVE TO FILE FURTHER INTERROGATORIES
CONCERNING JULY 13 ERRATA OF USPS
(July 20, 2006)

Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers move for leave to file interrogatories MPA/USPS-T35-23-24, which MPA and ANM have submitted separately to the Commission today. These interrogatories are prompted by further analysis of the errata filed by the Postal Service on Thursday, July 13, to Library Reference L-126 and the direct testimony of USPS witness Tang (USPS-T-35). The proffered questions seek clarification of apparent computational errors in the errata.

For the reasons explained here and in MPA-ANM's July 18 motion for leave to file interrogatories MPA/USPS-T35-18-22, good cause exists for allowing the filing of the interrogatories today. MPA and ANM incorporate by reference their July 18 motion.

WHEREFORE, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers move for leave to file interrogatories MPA/USPS-T35-23-24.

Respectfully submitted,

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July 20, 2006