

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

UNITED STATES POSTAL SERVICE MOTION SEEKING TO RESCHEDULE
THE APPEARANCE OF WITNESS DONALD O'HARA (USPS-T-31)
(July 27, 2006)

The United States Postal Service hereby moves that the Commission postpone the appearance of witness Donald O'Hara (USPS-T-31) for testimony in this docket until August 30, 2006.

Witness O'Hara currently is scheduled to testify on August 3, 2006. He is presently working diligently to clear a backlog of outstanding and overdue interrogatory responses. The Postal Service expects to file all such responses no later than August 2, 2006. Given the lateness of responses to interrogatories, should the current hearing schedule be maintained, intervenors are likely to consider that they will not have had a full and fair opportunity for additional written discovery to follow-up on those answers. Nor are they likely to consider that they will have had an opportunity to fully prepare for oral cross-examination, or to ensure that such cross-examination makes the most efficient use of the Commission's time and resources.

As a partial remedy for the lateness of interrogatory responses, the Postal Service proposes that witness O'Hara's appearance be rescheduled for August 30th, and the parties who have initiated discovery be allowed to conduct additional written discovery on USPS-T-31 through August 22nd, as well as

follow-up questions. The Postal Service is committed to making every effort to ensure that all such future responses to discovery requests will be prepared and filed within seven days, but certainly at least two days prior to witness O'Hara's proposed appearance in the hearing room on the August 30th. The Postal Service is authorized to represent that the following parties, all of whom have directed discovery to witness O'Hara thus far, consent to this request: American Bankers Association & National Association of Presort Mailers, American Postal Workers Union, Discover Financial Services & Morgan Stanley, Greeting Card Association, Newspaper Association of America, Office of the Consumer Advocate, United Parcel Service, and Valpak Direct Marketing Systems & Valpak Dealers' Association.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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