

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

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**AMERICAN POSTAL WORKERS UNION, AFL-CIO, MOTION SEEKING TO
RESCHEDULE THE APPEARANCE OF WITNESS JOHN P. KELLEY (USPS-T-30)
(July 28, 2006)**

The American Postal Workers Union, AFL-CIO (APWU) hereby moves that the Commission reschedule the appearance of witness John P. Kelley (USPS-T-30) to August 18, 2006. Currently Mr. Kelley is scheduled to appear for oral cross examination on his T-30 direct testimony on August 21, 2006. Lead Counsel for the APWU has an unalterable previous engagement in Michigan scheduled during the week of August 21st and therefore is unable to examine Mr. Kelley on the presently scheduled day.

In its July 17, 2006 Report on the Availability of Witnesses for Hearings, the United States Postal Service indicated that Mr. Kelley would be available August 7-30. The APWU proposes that the Commission reschedule Mr. Kelley's appearance regarding his T-30 direct testimony to August 18, 2006.

The APWU has contacted all participants who have, to date, indicated their intention to conduct oral cross examination of Mr. Kelley regarding his T-30 direct testimony. The APWU is authorized to represent that the following parties consent to this request: Amazon.com, Inc., Newspaper Association of America, Valpak Direct Marketing Systems, Inc. & Valpak Dealers' Association, Inc. and Major Mailers Association.

Respectfully submitted,

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