

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

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POSTAL RATE AND FEE CHANGES

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Docket No. R2006-1

OPPOSITION OF UNITED STATES POSTAL SERVICE TO  
MOTION OF TIME WARNER INC. TO DESIGNATE EVIDENCE  
FROM OTHER COMMISSION DOCKETS AND  
REQUEST FOR COUNTER-DESIGNATIONS  
(August 23, 2006)

Pursuant to Rule 31(e) of the Rules of Practice, the United States Postal Service hereby opposes the motion of Time Warner, Inc. to designate evidence from other dockets, and requests to counter-designate evidence from other Commission proceedings. Two copies will be provided with the Commission.

Opposition to Motion for Designation

The Postal Service opposes the designation of witness McCrery's response to TW/USPS-T29-1 in Docket No. R2005-1. Information contained in this response is no longer valid, and has in fact been updated, as seen in witness McCrery's response to TW/USPS-T42-29 in Docket No. R2006-1. The Postal Service has not confirmed whether information in the other designations is still valid, and therefore objects to the inclusion of these designations into the record. It is the Postal Service's position that incorrect and/or invalid information from previous dockets should not be made part of the record in this case.

## Request to Counter-Designate Evidence

The Postal Service requests to counter-designate the following evidence from other Commission dockets:

### **Docket No. R2005-1:**

Responses of Witness Van-Ty-Smith to TW/USPS-T11- 5b, 5d-g, 6a-c, 7b-d, 7f, 8a-c, 9a

### **Docket No. C2004-1:**

Rebuttal Testimony of Michael W. Miller on Behalf of United States Postal Service (USPS-RT-1) (Tr. 6/2150-66);

Rebuttal Testimony of Rachel Tang on Behalf of United States Postal Service (USPS-RT-2) (Tr. 6/2222-2235);

Response of Postal Service Witness Tang to Presiding Officer's Information Request No. 2 (Tr. 6/2237-51);

Response of United States Postal Service Witness Tang to Notice of Inquiry No. 1 Concerning Periodicals Data.

### **Docket No. R2001-1:**

Response of Witness Kingsley to AOL-TW/USPS-T39-9

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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