

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

Postal Rate and Fee Changes, 2006

:
:
:
Docket No. R2006-1

**MOTION OF THE GREETING CARD ASSOCIATION FOR
LATE FILING OF LIBRARY REFERENCES GCA-LR-L-1
and GCA-LR-L-2**

(September 7, 2006)

Yesterday, the Greeting Card Association (“GCA”) filed electronically library references GCA-LR-L1 and GCA-LR-L2 in support, respectively, of GCA-T-2 (testimony of Raymond Morrissey) and GCA-T-1 (testimony of James A. Clifton). GCA was instructed by the Commission’s Secretary’s office to instead refile these materials in hard copy together with electronic diskettes and the instant motion.

GCA-LR-L1 is a series of PDF images of envelopes mailed by GCA as part of its “Square Envelope Test.” Previously, GCA’s legal representatives had called the Secretary’s office and asked whether GCA should submit a box of actual test cards themselves or instead, PDFs of the cards. They were told to file only the PDFs and GCA’s legal representatives misconstrued this to mean to file the PDFs electronically.¹ Accordingly, GCA timely submitted the PDFs (GCA-LR-L1) electronically to the Commission together with GCA-LR-L2. GCA-LR-L2 are workpapers supporting GCA

¹ GCA will make the actual test cards available for reasonable inspection to rate case participants upon request at the law offices of Spiegel & McDiarmid in Washington, D.C.

witness Clifton's econometric testimony.

GCA is now submitting two hard copies of GCA-LR-L1 and L2 together with electronic diskettes for each.² The Commission should accept this filing in accordance with yesterday's instructions to GCA. There is good cause to do so, no party will be prejudiced and the Commission and participants will be assisted by the further development of the record.

Respectfully submitted,

/s/ James Horwood
James Horwood
Spiegel & McDiarmid
1333 New Hampshire Ave. NW, 2nd Floor
Washington, D.C. 20036

Date: September 7, 2006

² GCA witness Clifton used two pieces of proprietary commercial software in preparing his testimony and is not submitting those as part of GCA-LR-L2.