

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268B0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**MOTION FOR LATE ACCEPTANCE OF RESPONSES OF
GREETING CARD ASSOCIATION WITNESS
HARRY KELEJIAN (GCA-T5) TO DISCOVERY REQUEST OF
THE ALLIANCE OF NONPROFIT MAILERS**

(ANM/GCA-1)

(October 23, 2006)

The Greeting Card Association ("GCA") hereby moves for the late acceptance of the discovery response of Witness Harry Kelejian to the above-listed document requests, filed on October 4, 2006. The substantial amount of work required to complete answers to other concurrent interrogatories submitted by the Postal Service, together with Professor Kelejian's teaching schedule, delayed the requisite file search and completion of the responses to this discovery request.

Respectfully submitted,

/s/ James Horwood

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Date: October 23, 2006