

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,                    )  
2006    )                   Docket No. R2006-1

**MOTION OF MAGAZINE PUBLISHERS OF AMERICA, INC.,  
AND ALLIANCE OF NONPROFIT MAILERS  
FOR LEAVE TO FILE RESPONSE TO POIR NO. 19 OUT OF TIME  
(October 31, 2006)**

The Magazine Publishers of America, Inc. (“MPA”) and Alliance of Nonprofit Mailers (“ANM”) respectfully request leave to file the response of MPA/ANM witness Sander Glick to Presiding Officer’s Information Request No. 19 today, eight days after the October 23 date specified by ordering paragraph 5 of Presiding Officer’s Ruling No. R2006-1/81. The delay was necessitated by data errors in the responses to POIR 19 filed by the Postal Service. See Notice of the USPS of Filing of Revised Version of Library Reference USPS-LR-L-189 [Errata] (filed Oct. 17, 2006); Notice of the USPS of Filing of Second Revised Version of Library Reference USPS-LR-L-189 [Errata] (filed Oct. 23, 2006); Notice of the USPS of Filing of Third Revised Version of Library Reference USPS-LR-L-189 [Errata] (filed Oct. 25, 2006); see *also* Notice of the USPS of Filing of Fourth Revised Version of Library Reference USPS-LR-L-189 [Errata] (filed Oct. 31, 2006).

No participant should be injured by the delay. The current version of Library Reference USPS-LR-L-189 filed by the Postal Service includes the Postal Service’s complete response to POIR 19, not just the partial response contemplated by

ordering paragraph 2 of Presiding Officer's Ruling No. R2006-1/81. Accordingly, the present document constitutes the complete response of MPA and ANM to POIR 19, not just the initial response due on October 23, 2006, under Presiding Officer's Ruling No. R2006-1/81.

Respectfully submitted,

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