

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

POSTAL RATE AND FEE CHANGES, 2006)
)
) Docket No. R2006-1
)

**MOTION OF THE COALITION OF CATALOG MAILERS
FOR AN EXTENSION OF TIME
IN WHICH TO FILE A MOTION TO REOPEN
AND SUPPLEMENT THE RECORD
FOR RECONSIDERATION
(April 3, 2007)**

Pursuant to Rule 3001.16 of the Commission's Rules of Practice & Procedure, the Coalition of Catalog Mailers ("CCM") hereby requests an extension of time to file a motion to reopen the record for reconsideration only with respect to the Standard Mail flat rate increases.

CCM is an ad hoc coalition of catalog mailers that send large volumes of Standard Mail Regular flats.¹ CCM is interested in preserving the vitality and growth of the catalog industry and therefore has a vested interest in the outcome of the Reconsideration.

On February 26, 2007, the Postal Regulatory Commission issued its first Opinion and Recommended Decision in this proceeding. On March 19, 2007, the Governors of the United States Postal Service issued their Decision in response and returned three matters to the

¹ CCM is concurrently filing a Notice of Intervention which describes the members of CCM.

Commission for reconsideration.² On March 28, 2007, the Postal Service issued its Initial Statement of the United States Postal Service on Reconsideration (“Statement on Reconsideration”). On March 29, 2007, the Commission issued its Notice of Request for Reconsideration and Order Establishing Procedures (“Order Establishing Procedures”).

The Order Establishing Procedures provides that any motion to reopen and supplement the record must be filed no later than April 4, 2007.³ The Order also requires that any such participant must include “thorough justification for its request, including specific identification of the purported deficiencies in the current record for purposes of reconsideration and an explanation why that participant did not proffer the purportedly necessary materials during the hearing.”⁴ The record has little evidence, if any, of the crippling effect of the Commission’s proposed rate increases on the industry. The increases in the recommended decision were significantly greater than those proposed by the United States Postal Service and were unexpected. Because the catalogue industry will be significantly impacted, CCM would like to reopen the record to insert testimony regarding the qualitative and quantitative impact of the proposed rate increases. To provide a degree of factual specificity that will be helpful to the Commission, CCM will need additional time.

CCM recognizes that the Commission’s Order Establishing Procedures allows comments to be submitted until April 12, 2007. However, as the Commission itself reminded, “...comments unconnected to the record, particularly from persons not parties to the proceeding, are problematic and cannot be relied on by the Commission in resolving issues

² Decision of the Governors of the United Postal Service on the Opinion and Recommended Decision of the Postal Regulatory Commission on Changes in Postal Rates and Fees, Docket No. R2006-1 (March 19, 2007). (“Governors’ Decision”)

³ Order Establishing Procedures at 2.

⁴ Id.

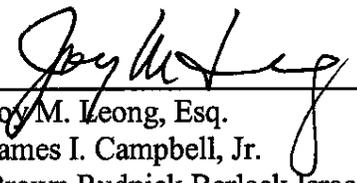
raised on reconsideration.”⁵ Therefore, CCM’s ability to file comments until April 12, 2007 does not afford it a full opportunity to protect the interests and vitality of the catalog industry. It should be noted that concurrent with this filing, the CCM has also filed a Motion for Late Acceptance of Notice of Intervention in order to fully participate in the reconsideration process.

The Governors have noted that “[t]he long-term interests of the Postal Service and its customers are served by a healthy catalog industry that creates interest in the mail and contributes to the institutional costs of the Postal Service.”⁶

The United States Postal Service has informed us that it does not oppose the filing of this motion for an extension of time to file a motion to reopen and supplement the record on the sole issue of the proposed Standard Mail Flats rate increases.

For the foregoing reasons, CCM respectfully requests the Commission to extend the time in which to file motions to reopen and supplement the record for purposes of the reconsideration on the sole issue of the proposed Standard Mail Flats rate increase until April 12, 2007.

Respectfully submitted,


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⁵ Id at. 6.

⁶ Governors’ Decision at 9.

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