

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network :
Rationalization Service : Docket No. N2012-1
Changes, 2012 :

GREETING CARD ASSOCIATION MOTION FOR LEAVE TO SUBMIT
SUPPLEMENTAL DESIGNATION OF WRITTEN CROSS EXAMINATION

By this motion the Greeting Card Association (GCA) requests leave to designate certain followup interrogatories and responses pertaining to the testimony of Postal Service witness Rosenberg (USPS-T3).

On the due date, March 19, 2012, GCA filed designations for witness Rosenberg. The following day, March 20, answers were received to a number of followup interrogatories (GCA/USPS-T3-40 to -50) which GCA had filed on March 6. GCA intends to designate six of these (GCA/USPS-T3-40, -42, -45, -46, -48, and -49).

In addition, it is necessary to designate five previously undesignated items from the original set of interrogatories to witness Rosenberg. As to GCA/USPS-T3-20 to -23 and -34, the witness requested clarification. GCA supplied the clarification via GCA/USPS-T3-46 and -48. Because those questions and the witness's responses are not adequately clear without the original interrogatories, we request leave to designate the latter at this point.

Because of the short time available to analyze the followup responses, GCA submits that it is appropriate to permit this late filing, and that no significant prejudice to any participant will result.

March 22, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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