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**Valassis NSA**

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**Docket No. MC2012-14**

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**Valassis NSA**

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**Docket No. R2012-8**

**OPPOSITION OF VALASSIS DIRECT MAIL, INC. TO MOTION OF  
NEWSPAPER ASSOCIATION OF AMERICA FOR EXTENSION OF TIME**

(June 19, 2012)

Today, the Newspaper Association of America (NAA) filed a motion requesting additional time to respond to the Commission's Notice of Inquiry No. 1. Valassis Direct Mail, Inc. (Valassis) opposes that request.

The Valassis NSA was filed with the Commission on April 30, 2012. NAA had three weeks to collect the kind of data concerning alleged harm that the Commission is now requesting in the NOI. Instead, in its comments filed on May 23rd, NAA chose to present just generalized assertions of harm. This proceeding has already been delayed beyond 45 days, and with the issuance of the NOI, the Commission's decision will undoubtedly be delayed until July. Because of the seasonality of advertising distribution contracts, the window of opportunity for launching the NSA program this year is narrowing. Further delays in this proceeding could well close that opportunity, forcing Valassis to pay a \$100,000 penalty to the Postal Service if it chooses to continue the NSA. The schedule for NOI responses set by the Commission properly recognizes the importance of expedition at this stage of the proceeding. Accordingly, Valassis urges the Commission to adhere to that schedule and to deny the NAA motion.

Respectfully submitted,

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