

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Annual Compliance Report, 2012

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Docket No. ACR2012

**MOTION OF THE
AMERICAN CATALOG MAILERS ASSOCIATION (ACMA)
FOR LEAVE TO SUBMIT SURREPLY COMMENTS TO
REPLY COMMENTS OF THE PUBLIC REPRESENTATIVE**

(February 20, 2013)

The Reply Comments of the Public Representative in the instant docket (filed on February 19, 2013) contain a "mathematical proof" that purportedly discredits ACMA's cost index but which is founded on a factual error in representing the index.¹ ACMA believes that very brief additional comments explaining the nature of the Public

¹ No comments on the index were included in the Representative's Initial Comments (February 1, 2013), even though the index was an issue in Docket No ACR2011 and has been ripe for response since ACMA filed related comments in Docket No. R2013-1.

Representative's misunderstanding can assist the Commission by clarifying the record on this highly technical issue.

ACMA therefore respectfully moves for leave to file brief surreply comments to the reply comments of the Public Representative on the ACMA cost index. We believe that the interests of no party will be prejudiced by granting this motion.

Respectfully submitted,

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