

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

**Postal Rate and Fee Changes, 2006**

**Docket No. R2006-1**

**REPLY TO THE JUNE 15, 2006  
MOTION OF OFFICE OF CONSUMER ADVOCATE**

On June 7, the Postal Service filed suggestions regarding the proposed procedural schedule in this case. The Postal Service suggested a 70-day discovery period, proposing July 12 as the cut-off date for initial discovery on the Postal Service's direct case, and September 1, 2006 as the due date for intervenor's pre-filed testimony. On June 15, 2006, the Office of the Consumer Advocate moved for a 90-day discovery period.

PostCom observes that there are very substantial deaveraging and reclassification proposals in this case, and that changes of this breadth and significance have not been seen in recent years. Participants need more time for discovery both to simply understand the impact of these changes, and obtain the information from the Postal Service essential to developing a direct case. A schedule allowing for procedural time frames comparable to that of the last fully litigated case (R2000-1) would suggest discovery ending during the last week in July.

Therefore, the Association for Postal Commerce ("PostCom") agrees in principle with the Office of the Consumer Advocate's motion for a discovery period extending beyond that suggested by the Postal Service. However, taking into consideration the concerns expressed by various parties at the pre-hearing conference on June 16, 2006, PostCom proposes establishing a

deadline for discovery requests of July 28, provided that Postal Service responses are timely filed.

Respectfully submitted,

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