

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

**POSTAL RATE AND FEE CHANGES, 2006**

**Docket No. R2006-1**

**MOTION OF POSTCOM FOR LEAVE TO FILE REPLY TO OPPOSITION OF  
GCA TO MOTION OF THE POSTAL SERVICE TO STRIKE  
PORTIONS OF THE TESTIMONY DOCUMENT OF  
GCA WITNESS JAMES A. CLIFTON (GCA-T-1)**

**September 22, 2006**

Pursuant to section 21(b) of the Rules of Practice, PostCom hereby respectfully moves for leave to file a reply to the opposition of GCA to the motion of the Postal Service to strike portions of testimony document of GCA witness James A. Clifton (GCA-T-1), filed on September 20, 2006. A reply by PostCom is warranted because these are extraordinary circumstances and PostCom has had no opportunity to address the issues raised in GCA's opposition. For these reasons, therefore, PostCom requests leave to file a reply to GCA's opposition. Such a reply is being submitted as a separate pleading.

Respectfully submitted,

Ian D. Volner  
Rita L. Brickman  
Jennifer T. Mallon  
Venable LLP  
575 7<sup>th</sup> Street, NW  
Washington, DC 20004-1601  
(202) 344-4814  
[idvolner@venable.com](mailto:idvolner@venable.com)  
Counsel to Association for Postal Commerce and  
Mailing and Fulfillment Service Association