

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**RESPONSE OF THE GREETING CARD ASSOCIATION TO THE  
STATEMENT OF THE AMERICAN BANKERS ASSOCIATION TO  
INTERROGATORIES FROM THE DIRECT MARKETING  
ASSOCIATION**

**(November 3, 2006)**

On October 30, 2006 the American Bankers Association (“ABA”) filed a “Statement . . . Regarding Responses by the Greeting Card Association to Interrogatories from the Direct Marketing Association.” ABA requested that its Statement be entered into the record. The Presiding Officer issued a ruling on October 30 in which he stated that the request will be treated as a motion with responses due on November 6, 2006.

The Greeting Card Association (“GCA”) files this response objecting to the inclusion of the Statement in the record as part of the evidentiary record. There is no sponsoring witness for the material contained in the Statement, particularly the two ABA Surveys referenced, neither of which existed at the time GCA Witness Clifton submitted his direct testimony for GCA in this case (September 6, 2006) or answered DMA/GCA-T-1-3b (September 15, 2006), the interrogatory response referred to by DMA in its Statement.<sup>1</sup> Therefore, there is no foundation

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<sup>1</sup> An earlier, but different, version of the 2000 Survey was available to Dr. Clifton and relied upon by him in his response to DMA/GCA-T-1-3b.

under Rule 31 for including the Statement and referenced ABA surveys as part of the evidentiary record.

The proper procedure for filing the Statement (and referenced Studies) would be for ABA to file it as a Category 6 library reference subject to the Commission's rules in Section 31(b(2) governing its use in this proceeding.

Respectfully submitted,

*/s/ James N. Horwood* \_\_\_\_\_

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