

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

POSTAL RATE AND FEE CHANGES, 2006)

Docket No. R2006-1

VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
MOTION FOR ACCEPTANCE OF
NOTICES OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION OF
SATURATION MAILERS COALITION AND ADVO, INC.
WITNESS ANTOINETTE CROWDER (SMC-RT-1) AND
NEWSPAPER ASSOCIATION OF AMERICA
WITNESS ALLAN T. INGRAHAM (NAA-RT-2)
ONE DAY OUT OF TIME
(November 30, 2006)

Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. ("Valpak") hereby move for leave to file their Notices of Intent to Conduct Oral Cross-Examination of Saturation Mailers Coalition and Advo, Inc. witness Crowder and Newspaper Association of America witness Ingraham one day out of time. Rule 30(e)(3) requires that such notices of intent be filed at least three working days before the scheduled cross-examination. Valpak's notices were scheduled to be filed yesterday afternoon, but were not filed at that time because of administrative oversight while counsel for Valpak was at the Commission conducting cross-examination of other witnesses in this proceeding. The notices have been submitted for filing this morning, which is technically late. Valpak notes that cross-examination of witnesses Crowder and Ingraham has been noticed by other parties herein, and it is submitted that no party or witness would be prejudiced by the granting of this motion.

Respectfully submitted,

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