

**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 DESIGNATIONS OF
WITNESS KINGSLEY OUT OF TIME**

The Association for Postal Commerce and the Mailing and Fulfillment Service Association (herein collectively "PostCom") hereby move for leave to designate certain portions of the direct testimony of Witness Linda A. Kingsley in Docket Nos. R2000-1 and R2001-1. Designation of this testimony was due on August 9, 2006, however, the issues expressed in Witness Kingsley's prior testimony regarding the processing of rigid mail pieces prepared as flats did not arise until Witness McCrery discussed it in his rebuttal testimony (USPS-RT-14 at 10) and during oral cross-examination of his rebuttal testimony by PostCom on December 1, 2006.

PostCom believes no party will be prejudiced by the delay.

Respectfully submitted,

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December 4, 2006

RESPONSES OF POSTCOM WITNESS KNIGHT TO INTERROGATORIES OF
THE UNITED STATES POSTAL SERVICE