

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LEAVE TO FILE RESPONSE TO REPLY OF MAJOR MAILERS
ASSOCIATION TO THE POSTAL SERVICE'S OPPOSITION TO MAJOR
MAILERS ASSOCIATION MOTION TO STRIKE
(December 19, 2006)

The United States Postal Service hereby moves for leave to file a response to the Reply of Major Mailers Association's to December 15, 2006 Opposition of the United States Postal Service to Major Mailers Association Motion to Strike Errata to Library References and Rebuttal Testimony of Postal Service Witness Loetscher, filed December 18, 2006.

The Postal Service submits that good cause exists to grant the Postal Service leave to file a response to the Reply of the Major Mailers Association (MMA). MMA filed a Reply to the Postal Service's Opposition in order to "set the record straight" on what MMA calls "material misrepresentations" regarding the Postal Service's errata. Given the seriousness of what MMA alleges in its Reply, the Postal Service contends that its response, limited to a statement of the facts necessary to clear up MMA's apparent misunderstanding, is entirely warranted under the circumstances.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Elizabeth A. Reed

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3179, Fax -6187