

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2000 :

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DOCKET NO. R2000-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIFICATION BY UNITED PARCEL SERVICE
OF PORTIONS OF THE TESTIMONY OF
POSTAL SERVICE WITNESSES HUNTER AND
PAFFORD TO BE STRICKEN FROM THE RECORD
(April 14, 2000)

Pursuant to the Presiding Officer's ruling of April 11, 2000 (Tr. 2/94), United Parcel Service hereby identifies the portions of the testimony of United States Postal Service witnesses Herbert B. Hunter, III, and Bradley V. Pafford relating to the Postal Service's BRPW estimates of Parcel Post revenue, pieces, and weight to be stricken from the record, on the ground that the Postal Service has not provided an adequate foundation for the admission into evidence of that testimony. UPS intends to file within the next few days a motion to compel seeking a ruling that would require the Postal Service to provide certain of the foundation evidence that is lacking. Once that discovery dispute has been finally resolved, UPS intends to supplement its arguments in support of its Objection of April 10, 2000, to the admission into evidence of this testimony, based on the more complete record that will then exist. In the meantime, UPS identifies the following as the testimony at issue:

TESTIMONY OF UNITED STATES POSTAL SERVICE
WITNESS HERBERT B. HUNTER, III
TO BE STRICKEN FROM THE RECORD

USPS-T-5

<u>Page</u>	<u>Line</u>	<u>Testimony to be Stricken</u>
2	18-19	"Parcel Post and"
3	6-7	"The PERMIT System is documented in Library References USPS-LR-I-44 through USPS-LR-I-48."
3	16	"Parcel Post"
6 (Table 1)	42	The entire line for "Parcel Post"
6 (Table 1)	47	The entire line for "Total Standard Mail (B)"
7 (Table 1)	10	The entire line for "Total Domestic Mail"
7 (Table 1)	12	The entire line for "Total All Mail"
7 (Table 1)	25	The entire line for "Total Mail & Special Services"
7 (Table 1)	27	The entire line for "Total Income"
8 (Table 2)	42	The entire line for "Parcel Post"
8 (Table 2)	47	The entire line for "Total Standard Mail (B)"
9 (Table 2)	10	The entire line for "Total Domestic Mail"
9 (Table 2)	12	The entire line for "Total All Mail"
9 (Table 2)	28	The entire line entitled "Total"
10 (Table 3)	42	The entire line for "Parcel Post"
10 (Table 3)	47	The entire line for "Total Standard Mail (B)"
11 (Table 3)	10	The entire line for "Total Domestic Mail"
11 (Table 3)	12	The entire line for "Total All Mail"

Library Reference I-25

<u>Page</u>	<u>Line</u>	<u>Testimony To Be Stricken</u>
1	14	"and Parcel Post"

Library Reference I-26

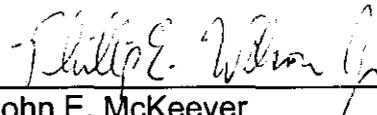
<u>Page</u>	<u>Line</u>	<u>Testimony To Be Stricken</u>
1	21-22	"and Parcel Post from Forms 3605"
3	8-11	"In the case of permit imprint Standard Mail (B) parcel post for which the automated office coverage ratio is near unity for the FY 1998 period, a residual permit imprint parcel post revenue adjustment factor is applied."

TESTIMONY OF UNITED STATES POSTAL SERVICE
WITNESS BRADLEY V. PAFFORD
TO BE STRICKEN FROM THE RECORD

USPS-T-4

<u>Page</u>	<u>Line</u>	<u>Testimony To Be Stricken</u>
8 (Table 1)	42	The entire line for "Parcel Post"
8 (Table 1)	47	The entire line for "Total Standard Mail (B)"
9 (Table 1)	10	The entire line for "Total Domestic Mail"
9 (Table 1)	12	The entire line for "Total All Mail"
9 (Table 1)	25	The entire line for "Total Mail & Special Services"
9 (Table 1)	27	The entire line for "Total Income"
10 (Table 2)	42	The entire line for "Parcel Post"
10 (Table 2)	47	The entire line for "Total Standard Mail (B)"
11 (Table 2)	10	The entire line for "Total Domestic Mail"
11 (Table 2)	12	The entire line for "Total All Mail"
11 (Table 2)	28	The entire line entitled "Total"
12 (Table 3)	42	The entire line for "Parcel Post"
12 (Table 3)	47	The entire line for "Total Standard Mail (B)"
13 (Table 3)	10	The entire line for "Total Domestic Mail"
13 (Table 3)	12	The entire line for "Total All Mail"

Respectfully submitted,



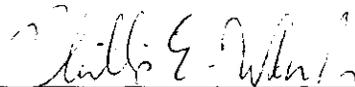
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: April 14, 2000
Philadelphia, Pa.

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