

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 1997 :

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DOCKET NO. R97-1

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MOTION OF UNITED PARCEL SERVICE  
TO MODIFY SPECIAL RULES OF PRACTICE  
AND NOTICE OF ISSUE TO BE DISCUSSED  
AT PREHEARING CONFERENCE

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(July 25, 1997)

Pursuant to Section II (E) of Commission Order No. 1186 (July 11, 1997), United Parcel Service hereby moves that the Special Rules of Practice for this proceeding be amended to require that three (3) copies of library references be filed with the Commission.

The determination of postal rates and classifications depends almost exclusively on obtaining and evaluating data in the sole control of the Postal Service. As a result, the most crucial phase of the proceeding for intervenors is the period for obtaining and evaluating the costing and other data relied on by the Postal Service's witnesses.

Much of that information is not served on the parties but rather is filed with the Commission as library references. In order to avoid unnecessary delay, it is important that the parties be able to obtain these library references as promptly as possible. Unfortunately, only one copy of library references is filed with the Commission. Since many parties seek access to many of the same library references at the same time, there are often frustrating delays in even beginning to

analyze the Postal Service's case because of the inability to obtain a key library reference while another party has borrowed it to make copies. This problem could be somewhat alleviated if more than one copy of library references were filed with the Commission. We suggest that the Commission's Special Rules for this proceeding require that at least three (3) copies of library references be filed with the Commission.

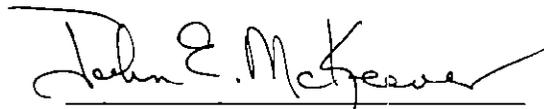
We realize that this will entail additional expense for the parties, especially the Postal Service. However, this is unavoidable, given the tight time constraints faced by the Commission and the parties. The additional expense appears to be minimal, given the scope of these proceedings. The burden on the Postal Service may actually be reduced to some extent because more timely analysis of the Postal Service's filing may reduce discovery practice.

Having additional library references available for the parties to review and copy could also reduce the burden on the Commission's docket room personnel, who are faced with repeated requests for many of the same materials and who must, we understand, compile waiting lists of the parties seeking crucial library references.

UPS intends to raise this issue at the prehearing conference scheduled for July 30. If agreement on this matter is reached at the conference, then this motion will be moot. However, we are filing this motion in the event that agreement cannot be reached, so that the issue may be resolved as quickly as possible.

WHEREFORE, United Parcel Service respectfully requests that the Special Rules of Practice for this proceeding be amended to require that three (3) copies of all library references be required to be filed with the Commission.

Respectfully submitted,

A handwritten signature in black ink, reading "John E. McKeever", written over a horizontal line.

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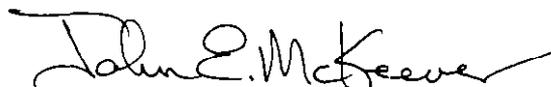
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of Counsel.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

  
John E. McKeever

Dated: July 25, 1997  
Philadelphia, Pa.