

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

RATE AND SERVICE CHANGES TO IMPLEMENT
FUNCTIONALLY EQUIVALENT NEGOTIATED
SERVICE AGREEMENT WITH BANK ONE
CORPORATION

Docket No. MC2004-3

UNITED STATES POSTAL SERVICE MOTION
FOR INCLUSION OF DIRECT TESTIMONY, DESIGNATED WRITTEN CROSS-
EXAMINATION, AND RESPONSES TO POIRS INTO THE RECORD
(September 13, 2004)

The United States Postal Service hereby moves that the Direct Testimony of Michael K. Plunkett on Behalf of United States Postal Service (USPS-T-1), including its attachments, as amended by errata, be included in the record, along with his designated written cross-examination and responses to POIRs, in accordance with Presiding Officer's Ruling No. MC2004-3/3 (August 25, 2004). A declaration from witness Plunkett attesting to this proposed record material is being filed separately this day. Two copies of this testimony have been provided to the Commission this day.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 13, 2004

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

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September 13, 2004