

ORIGINAL
BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

MOTION OF UNITED PARCEL SERVICE FOR
LEAVE TO FILE SUPPLEMENTAL TESTIMONY
OF RALPH L. LUCIANI CONCERNING
MAIL PROCESSING COSTS DERIVED
PURSUANT TO ORDER NO. 1203

(February 13, 1998)

United Parcel Service hereby moves for leave to file the attached Supplemental Testimony of Ralph L. Luciani on Behalf of United Parcel Service Concerning Mail Processing Costs Derived Pursuant to Order No. 1203, for the reasons stated below.

Commission Order No. 1203 required the Postal Service to present mail processing costs based on the methodology used by the Commission in Docket No. R94-1 in response to a number of interrogatories filed by the Office of the Consumer Advocate. The Postal Service has recently filed interrogatory responses which indicate that its presentation pursuant to Order No. 1203 contains a number of errors. Motion for Late Acceptance and Response of United States Postal Service to Interrogatories of United Parcel Service Redirected from Witness Crum (UPS/USPS-T28-42 - 46) (February 4, 1998). UPS witness Ralph L. Luciani, who has sponsored testimony on mail processing costs (UPS-T-4), has reviewed the Postal Service's Order No. 1203 presentation and its recently-filed answers. He has prepared the attached



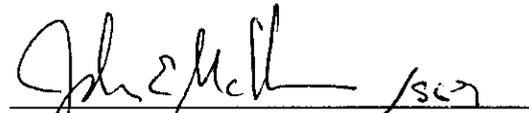
supplemental testimony documenting those errors which would overstate by substantial margins certain of the avoided cost estimates which form the basis of the Postal Service's discount proposals for Parcel Post.

In order to avoid any risk that these substantially overstated avoided cost estimates would mislead or confuse, UPS requests permission to file the attached Supplemental Testimony of Mr. Luciani, which points out and corrects these apparent errors.

United Parcel Service submits that permitting this Supplemental Testimony to be filed would aid in the development of a clear, correct, and complete record and would not prejudice any party since there remains adequate time in the proceeding for the parties to conduct discovery with respect to this Supplemental Testimony.

WHEREFORE, United Parcel Service respectfully requests leave to file the attached Supplemental Testimony of Ralph L. Luciani on Behalf of United Parcel Concerning Mail Processing Costs Derived Pursuant to Order No. 1203.

Respectfully submitted,


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