

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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COMPLAINT ON POST E.C.S.

DOCKET NO. C99-1

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STATEMENT OF UNITED PARCEL SERVICE  
PURSUANT TO ORDER NO. 1239  
(May 13, 1999)

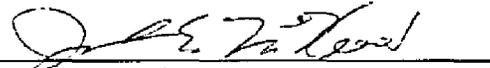
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Pursuant to Commission Order No. 1239 (issued May 3, 1999), Complainant United Parcel Service ("UPS") hereby files its statement estimating the amount of time UPS believes it will require to develop and file its case-in-chief in this proceeding.

In Order No. 1239, the Commission determined to institute formal proceedings under 39 U.S.C. § 3624 to "enable the Complainant and other interested parties to adduce additional facts through discovery and to make evidentiary presentations." Order No. 1239 at 8. UPS has already indicated its intent to conduct discovery. See, e.g., Motion of United Parcel Service for Leave to Conduct Discovery (March 17, 1999). Our initial discovery will be filed shortly. We anticipate the need to conduct followup discovery upon receipt of the Postal Service's responses to our initial discovery. Since the Postal Service has 20 days under the Commission's rules to respond to discovery requests, UPS estimates that, assuming timely responses and no discovery disputes, it will need just under two months to complete discovery.

As a result, UPS proposes that July 27, 1999, be established as the date for the filing of its case-in-chief, to permit UPS to complete discovery and make use of that discovery in its case-in-chief.

Respectfully submitted,



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and

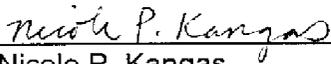
1200 19th Street, N.W.  
Washington, DC 20036  
(202) 861-3900

Of Counsel

Dated: May 13, 1999

CERTIFICATE OF SERVICE

I hereby certify that on this date I have caused to be served the foregoing document on all parties to this proceeding by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.

  
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Nicole P. Kangas

Dated: May 13, 1999  
Philadelphia, PA