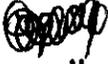


BEFORE THE POSTAL RATE COMMISSION  
WASHINGTON, DC 20268

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OFFICE OF THE SECRETARY

Complaint on Charges for the )  
Bulk Parcel Return Service ) Docket No. C99-4

CONTINUITY SHIPPERS ASSOCIATION  
MOTION TO ADMIT EVIDENCE AND  
REQUEST FOR THE COMMISSION TO TAKE OFFICIAL NOTICE

The Continuity Shippers Association formally moves that the Commission enter into evidence, or take official notice of, the following evidence:

- The 1998 Bulk Parcel Return Service Cost Study Prepared by the Postal Service;
- The Revision to the 1998 Bulk Parcel Return Service Cost Study Distributed by the Postal Service in September 1999;
- The Consumer Price Index - Urban (CPIU) for the 12 month period from September 1998 to August 1999 was 2.6%; and
- The Cost and Overhead Percentages for Various Classes of Mail from the R97-1 Rate Case Decision and Recommendation by the Commission and Approved by the Board of Governors.

Although the CSA believes the procedural requirements have been met to have the Commission rely on this evidence, the CSA is making this motion solely to avoid any questions or doubts as to this issue.

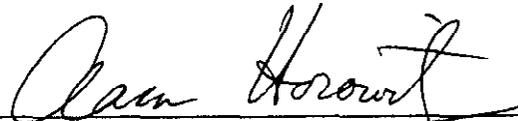
The Postal Service is simply wrong when it states in its October 25, 1999 reply that a witness is required. First, the Postal Service implicitly conceded that no witness was needed to admit its BPRS Cost Study. Second, the Commission can take official notice of the CPIU (for the roll forward factor) and its

decision and recommendation from the R97-1 rate case that was adopted by the Board of Governors (for the coverage percentage). The purpose of taking official notice is to remove the need for a witness. Thus, contrary to the Postal Service's reply, no additional evidence is required.

Wherefore, the Continuity Shippers Association moves that the Postal Rate Commission enter into evidence or take official notice of the items noted above.

Dated: November 3, 1999

Respectfully Submitted,



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CERTIFICATE OF SERVICE

This will certify that the foregoing Motion was served on November 3, 1999, by first class mail, on the following:

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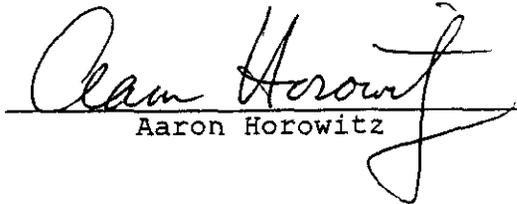
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