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BEFORE THE POSTAL RATE COMMISSION
WASHINGTON, DC 20268

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

CONTINUITY SHIPPERS ASSOCIATION MOTION
TO DESIGNATE CERTAIN FINDINGS FROM
DOCKET R97-1 AS EVIDENCE IN DOCKET C99-4

The Continuity Shippers Association moves that the Commission take official notice of the following findings from docket R97-1 in this docket:

- The coverage for Standard A mail regular in R97-1 is 135%. R97-1, pp. 435.
- The coverage for Bound Printed Matter in R97-1 is 136%. R97-1, pp. 500-01.

There are legal, factual and practical reasons for including the above referenced findings. In essence, the legal standards are satisfied because the participants have already taken extensive advantage of opportunities to review, conduct discovery and cross examine the evidence leading to the findings in R97-1. That evidence was also properly admitted as record evidence in R97-1. This reflects the participants' full exercise of their due process rights.

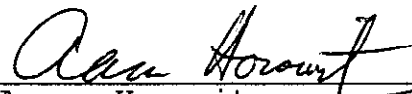
In addition to these legal and factual bases for the designation of, and continued reliance upon, the above referenced findings, a practical set of reasons also applies. The CSA requests expedition, consistent with due process rights, in order to finally correct the rate anomaly created by the R94-1 rate

case for single piece third class mail. This anomaly was partially addressed with the creation of BPRS, but has remains uncorrected.

WHEREFORE, the Continuity Shippers Association requests that the Commission take official notice of the matter referenced above in this docket.

Dated: December 1, 1999

Respectfully Submitted,



Aaron Horowitz
200 Corporate Woods Parkway
Vernon Hills, IL 60061-3167
(847) 913-3360

Attorney for the Continuity
Shippers Association

CERTIFICATE OF SERVICE

This will certify that the foregoing Motion was served on December 1, 1999, by first class mail, on the following:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking
United States Postal Service
475 L'Enfant Plaza West, S.W.
Washington, DC 20260-1145

Timothy J. May, Esq.
Patton Boggs LLP
2550 M Street, NW
Washington, DC 20037-1350

John M. Burzio
Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N.W.
Washington, DC 20007-4403

Mr. Pierce Myers
Executive Vice President
Parcel Shippers Association
1211 Connecticut Ave, NW
Suite 610
Washington DC 20036

James R. O'Brien
Director, Distribution & Postal Affairs
Time, Inc.
Time & Life Building, 38th Floor
Rockefeller Center
New York, NY 10020-1393

N. Frank Wiggins
Venable, Baetjer, Howard
& Civiletti, LLP
1201 New York Avenue, NW
10th Floor
Washington DC 20005

John E. McKeever
Piper & Marbury, L.L.P.
2400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762

Gene Del Polito
Advertising Mail Marketing
Association
1901 N. Fort Myers Drive
Arlington, VA 22209-1609

Linda Shepherd
United Parcel Service
Corporate Strategy Group
55 Glenlake Parkway, NE
Atlanta, GA 30328-3498

Lawrence G. Buc
Project Performance Corp.
20251 Century Boulevard
Germantown, MD 20874-2645

Dana T. Ackerly, Esq.
Covington & Burling
1201 Pennsylvania Ave, NW
PO Box 7566
Washington, DC 20044-7566

Mark L. Pelesh
John R. Przepyszny
Drinker Biddle & Reath LLP
1500 K Street NW
Suite 1100
Washington DC 20005



Aaron Horowitz