

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

COMPLAINT ON POST E.C.S.

DOCKET NO. C99-1

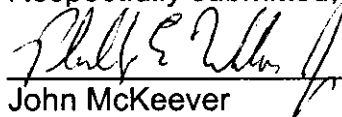
ANSWER OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE MOTION
FOR CLARIFICATION AND CORRECTION OF ORDER NO. 1283,
AND MOTION FOR FURTHER CLARIFICATION
(FEBRUARY 10, 2000)

United Parcel Service hereby responds to the United States Postal Service Motion for Clarification and Correction of Order No. 1283. United Parcel Service does not object to the corrections and clarifications proposed by the Postal Service.

United Parcel Service also hereby moves that the Commission make an additional clarification by inserting a comma after the phrase "legal advice" in the last sentence of paragraph 1(b) of the Statement of Compliance with Protective Conditions. Docket No. C99-1, Order No. 1283, Appendix A, at 1, ¶ 1(b). This correction is necessary to clarify that the phrase "not directly in furtherance of activities in competition with a person or entity having a proprietary interest in the protected material" does not modify the phrase "legal advice." Legal advisors should have access to protected materials in all circumstances as long as they merely provide legal advice, and inserting the comma makes this clear.

WHEREFORE, United Parcel Service respectfully requests that the Commission revise the last sentence of paragraph 1(b) of the Statement of Compliance with Protective Conditions by inserting a comma after the phrase "legal advice."

Respectfully submitted,



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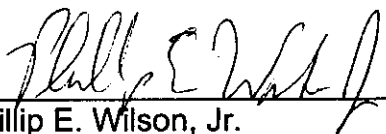
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Of Counsel.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: February 10, 2000
Philadelphia, Pa.