

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001**

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OFFICE OF THE SECRETARY

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**POSTAL RATE AND FEE CHANGES, 2000**

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**Docket No. R2000-1**

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**ALLIANCE OF NONPROFIT MAILERS  
AMERICAN BUSINESS PRESS  
COALITION OF RELIGIOUS PRESS ASSOCIATIONS  
DOW JONES & COMPANY, INC.  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
NATIONAL NEWSPAPER ASSOCIATION  
THE MCGRAW-HILL COMPANIES, INC.  
AND  
TIME WARNER INC.  
IDENTIFICATION OF EXPECTED AMOUNT  
OF ORAL CROSS-EXAMINATION  
and  
REQUEST FOR SPECIAL SCHEDULING OF  
DESIGNATED WITNESSES**

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**(March 16, 2000)**

Pursuant to the direction of the Presiding Officer, the Alliance of Nonprofit Mailers, American Business Press, Coalition of Religious Press Associations, Dow Jones & Company, Inc., Magazine Publishers of America, Inc., National Newspaper Association, the McGraw-Hill Companies, Inc. and Time Warner, Inc. (collectively, "Periodicals Intervenors") report that, at present, they expect to conduct oral cross-

examination of the following Postal Service witnesses to the extent indicated:

<b><u>USPS Witness</u></b>		<b><u>Extent of Oral Cross-Examination</u></b>
Xie	(USPS T-1)	Light
Hunter	(USPS T-5)	Moderate
Tolley	(USPS T-6)	Light
Tayman	(USPS T-9)	Moderate
Kingsley	(USPS T-10)	Moderate
Meehan	(USPS T-11)	Light
Baron	(USPS T-12)	Moderate to Heavy
Raymond	(USPS T-13)	Moderate to Heavy
Kashani	(USPS T-14)	Light
Bozzo	(USPS T-15)	Light
Degen	(USPS T-16)	Moderate
Van-Ty-Smith	(USPS T-17)	Light
Bradley	(USPS T-18)	Moderate
Pickett	(USPS T-19)	Light
Smith	(USPS T-21)	Light
Yacobucci	(USPS T-25)	Moderate
Mayes	(USPS T-32)	Light
Taufique	(USPS T-38)	Light

## **REQUEST REGARDING SPECIAL SCHEDULING**

With reference to the Presiding Officer's Ruling No. R2000-1/4 (issued February 25, 2000), Periodicals Intervenors hereby respectfully request that seven of the witnesses they have designated for moderate or heavy cross-examination (Tayman, Kingsley, Baron, Raymond, Degen, Bradley and Yacobucci) be scheduled for appearance *either* during the week of April 11, or between April 24 and May 5, 2000.

Periodicals Intervenors are acting in concert in this proceeding to the greatest extent possible. Given the complexity of this proceeding and the necessarily compressed schedule, we hope that our unified efforts are of procedural and logistical value to all concerned, including the Commission.

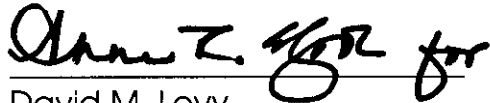
Periodicals Intervenors will be coordinating their cross-examination schedules. Specifically, one or two representatives of Periodicals Intervenors' member organizations will take responsibility for cross-examination of each USPS witness designated above.

During the week of April 17, attorneys for members APB and Dow Jones, as well as the technical expert for MPA - each having important responsibilities related to cross-examination (and/or cross-examination preparation) -- will be unavailable due to unavoidable conflicts. As a result, Periodicals Intervenors' ability to conduct cross-examination of key witnesses during the week of April 17 will be necessarily -- and

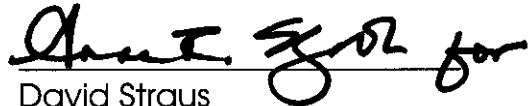
unavoidably - constrained. For that reason, we respectfully request that the seven witnesses identified herein on page three not be scheduled during that week.

This request has been discussed with the Postal Service counsel.

Respectfully submitted,



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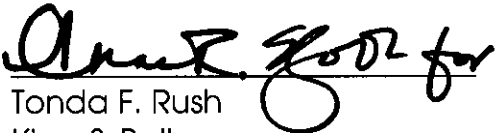
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