

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

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Docket No. R2000-1

DMA MOTION TO INCLUDE  
CERTAIN TESTIMONY FROM DOCKET R97-1  
IN THE RECORD AS PART OF THE  
WRITTEN CROSS-EXAMINATION OF USPS WITNESS MAYES

Direct Marketing Association, Inc. ("DMA") hereby moves the Commission to admit into evidence and include in the record as part of the written cross-examination of USPS witness Mayes the testimony from Docket No. R97-1 identified in Attachment A hereto (hereinafter, collectively, the "R97-1 Testimony"). The R97-1 Testimony was referenced by witness Mayes in her answers to certain interrogatories, each of which DMA has designated as written cross-examination. DMA respectfully submits that the R97-1 Testimony is essential to an understanding of witness Mayes' testimony in this case and that it may form the foundation for oral cross-examination of the witness. Accordingly, it is properly admissible as evidence in this case.

Moreover, it will greatly enhance the usefulness of the record for the R97-1 Testimony to be added physically in the written transcript in close proximity to the written cross-examination that makes reference to it.

Accordingly, DMA moves that the R97-1 Testimony be admitted into evidence and transcribed immediately following the interrogatory answer that makes reference thereto. DMA is filing with the Commission two copies of the R97-1 Testimony in accordance with Commission practice relating to designation of written cross-examination. The undersigned is authorized to state that Postal Service counsel has no objection to this motion.

Respectfully submitted,



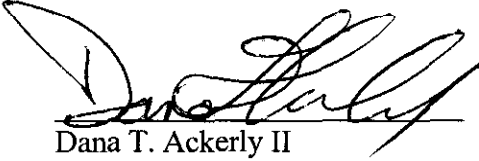
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Counsel for the Direct Marketing  
Association, Inc.

Dated: April 19, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commissioner's Rules of Practice, as modified by the Special Rules of Practice.



Dana T. Ackerly II

ATTACHMENT A

Interrogatory Answer

NAA/USPS-T32-5(c)

NAA/USPS-T32-14

NAA/USPS-T32-17

NAA/USPS-T32-20

R97-1 Testimony Referred To

O'Hara-USPS-T30, at 16-20

Panzar-USPS-T11, at §§ I.A. & I.B.  
O'Hara-USPS-T30, at 11-16

O'Hara-USPS-T30, at 14-16

O'Hara-USPS-T30, at Table B-1.