

BEFORE THE
POSTAL RATE COMMISSION

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DOCKET NO. R2000-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

NOTICE BY UNITED PARCEL SERVICE OF INTENT
TO CONDUCT ORAL CROSS-EXAMINATION OF
UNITED STATES POSTAL SERVICE WITNESS
BOZZO (USPS-T-15)
(April 26, 2000)

Pursuant to Section 30(e)(3) of the Commission's Rules of Practice, United Parcel Service ("UPS") hereby gives notice that it intends to conduct oral cross-examination of United States Postal Service witness Bozzo on the following subjects: the nature and quality of MODS data, data scrubs, and witness Bozzo's threshold and productivity scrubs (USPS-T-15 at 23, 80-83, 94-103); witness Bozzo's variables, including his control variables (USPS-T-15 at 23-28, 34-35, 44-47, 56-59, 88-94); the use of cost pools as the unit of analysis (USPS-T-15 at 42-44); the relationships among activities at a facility and across facilities (USPS-T-15 at 47-50, 124-126); the relationship between capital and volume (USPS-T-15 at 39-41); the use of TPH, TPF, or other measures as a proxy for volume (USPS-T-15 at 50-53); the effects of measurement error (USPS-T-15 at 83-88, 103-121, 128-130); the use of a fixed-effects model (USPS-T-15 at 67-71, 122-124, 130-132); the evaluation of the econometric

results (USPS-T-15 at 121-160); and clarification of and expansion on witness Bozzo's interrogatory responses.

Respectfully submitted,

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

Dated: April 26, 2000
Philadelphia, Pa.