

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

Docket No. R2000-1

MAIL ORDER ASSOCIATION OF AMERICA
DESIGNATION OF INTERROGATORY RESPONSES
AS WRITTEN CROSS EXAMINATION
OF AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS WITNESS CLIFTON
(MOAA/ABA&NAPM-T1)
AND
MOTION FOR ORAL CROSS-EXAMINATION

The Mail Order Association of America (MOAA) moves for leave to engage in oral cross-examination of witness Clifton. The purpose of the cross-examination will be to follow-up on responses to interrogatories.

MOAA designates the following as its written cross-examination of witness Clifton. Two copies of each designated interrogatory and witness Clifton's response are attached.

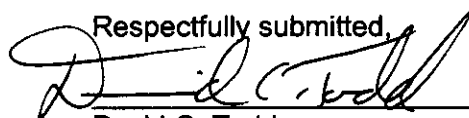
Mail Order Association of America
MOAA/ABA&NAPM-T1-1-9, 12

United States Postal Service
USPS/ABA&NAPM-T1-3-4

Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc.
VP-CW/ABA&NAPM-T1-4-7

Direct Marketing Association
DMA/ABA&NAPM-T1-3-4

Respectfully submitted,

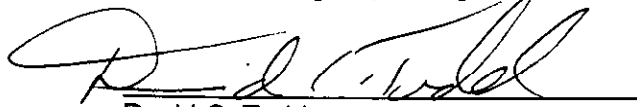


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Counsel for Mail Order Association of America

Date: July 7, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.

A handwritten signature in black ink, appearing to read "David C. Todd", written over a horizontal line.

David C. Todd

Date: July 7, 2000