

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

POSTAL RATE DIVISION OF
OFFICE OF THE SECRETARY

MOTION OF UNITED PARCEL SERVICE FOR LEAVE
TO FILE SUPPLEMENTAL TESTIMONY CONCERNING
PARCEL POST RPW ESTIMATES
(July 24, 2000)

United Parcel Service ("UPS") hereby moves for leave to file supplemental testimony on or before August 14, 2000, concerning Parcel Post RPW estimates, for the reasons stated below.

After a great deal of motions practice,¹ the Presiding Officer in Ruling No. R2000-1/72 (May 30, 2000) directed the Postal Service to produce certain data and information

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1. See, e.g., Motion of United Parcel Service to Compel Production of Information and Documents Requested in Interrogatories UPS/UPS-T5-40(c), 58(b)-(c), 82 and 87 to Witness Hunter or, in the Alternative, to Strike Testimony, filed under protective conditions (April 17, 2000); Motion of United Parcel Service to Compel Production of Information and Documents Requested in Interrogatory UPS/USPS-6 or, in the Alternative, to Extend Discovery Deadline on BRPW Parcel Post Estimates (April 28, 2000); Motion of United Parcel Service to Compel Production of Documents Requested in Interrogatory UPS/USPS-12 (May 1, 2000); Motion of United Parcel Service to Compel Production of Information Requested in Interrogatories UPS/USPS-12A-15 (May 2, 2000); and Objection of United States Postal Service to Interrogatory of United Parcel Service and UPS/USPS-12A-15, 35; Response to United Parcel Service Motion to Compel Responses to UPS/USPS-12A-15; and Response of United States Postal Service to Motion of United Parcel Service to Compel Production of Information and Documents in Interrogatory UPS/USPS-6 or, in the Alternative to Extend Discovery Deadline on BRPW Parcel Post Estimates (May 5, 2000).

concerning PERMIT System postage statement-level data. On Friday, June 23, 2000, UPS obtained from the docket section USPS-LR-I-401, entitled "Permit Imprint Parcel Post Data Extract and Documentation" (subject to protective conditions). On July 3, 2000, UPS obtained from the Commission docket section USPS-LR-I-403, entitled "Permit Imprint Parcel Post Survey" (also subject to protective conditions).

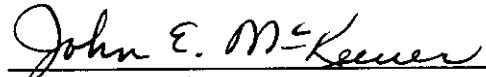
UPS has since been attempting, as a first step in the analysis of this data, to tie that information to the highly aggregated BRPW data relied on by the Postal Service to support its Parcel Post RPW estimates. UPS has had some success in that regard, but it continues to work with the Postal Service to achieve that end.

The (perhaps unavoidable) delay in producing the information in Library References USPS-LR-I-401 and 403 prevented UPS from presenting its analysis of that information in its testimony filed on May 22, 2000, a full month before the data was produced. Thus, UPS seeks leave to present supplemental testimony on the data in those library references.

UPS submits that permitting such supplemental testimony to be filed would aid in the development of a clear, correct, and complete record. In light of the fact that UPS and the Postal Service continue to work to attempt to tie the data to the BRPW data files, UPS proposes that the supplemental testimony be filed no later than August 14, 2000, the deadline for intervenor testimony updating intervenor presentations to take account of the availability of FY1999 data.

WHEREFORE, United Parcel Service respectfully requests leave to file supplemental testimony concerning Parcel Post RPW estimates on or before August 14, 2000.

Respectfully submitted,



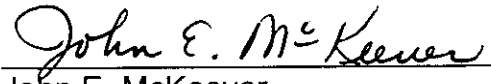
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Of Counsel.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.



John E. McKeever

Dated: July 24, 2000
Philadelphia, Pa.

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