

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

MOTION OF UNITED PARCEL SERVICE TO FILE NOTICE TWO
DAYS OUT OF TIME AND NOTICE BY UNITED PARCEL SERVICE
OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION OF
POSTAL SERVICE WITNESS THOMAS E. THRESS

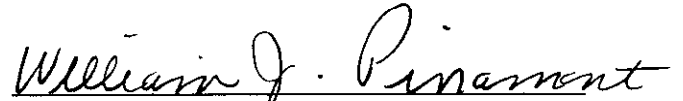
(August 2, 2000)

United Parcel Service ("UPS") hereby moves for leave to file two days out of time this notice of intent to conduct oral cross-examination. UPS submits that granting this motion will not prejudice any party. UPS has faxed a copy of this motion and notice to Postal Service counsel.

Pursuant to Rule 30(e)(3) of the Commission's Rules of Practice, UPS intends to conduct oral cross-examination of United States Postal Service witness Thomas E. Thress, who is scheduled to appear on August 3. The subject of cross-examination will

be actual volumes versus forecast volumes for the first three quarters of 2000.

Respectfully submitted,

A handwritten signature in cursive script that reads "William J. Pinamont".

John E. McKeevel

William J. Pinamont

Phillip E. Wilson, Jr.

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Of Counsel.

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.


William J. Pinamont
William J. Pinamont
Attorney for United Parcel Service

Dated: August 2, 2000.
Philadelphia, Pa.

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