

**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

DOCKET NO. R2000-1

**PARCEL SHIPPERS ASSOCIATION (PSA) DESIGNATION
OF RESPONSES TO INTERROGATORIES AND MOTION TO STRIKE PORTIONS
OF THE DESIGNATED RESPONSES**

United Parcel Service, on August 28, 2000, filed responses to UPS-ST1-1 and ST1-2. PSA has attached hereto two versions of the UPS responses. One version are the responses as filed by United Parcel Service; and the second version is a redacted version which excludes material that PSA moves be stricken.

UPS has taken the opportunity, while responding to PSA's interrogatories, to include materials that are not in any way responsive to the interrogatories, nor necessary to qualify or explain the responses properly made to the interrogatories. For example, when asked to confirm various data for GFY 1999, UPS has made the confirmation, but then has added comments about data for FY 1998 or GFY 1998.

United Parcel Service cannot be permitted to introduce into the record, at the absolute last stage of this proceeding, material that should have been part of their rebuttal or supplemental testimony, by connecting it to their responses to interrogatories. This confronts PSA with The Hobson's choice of being forced to include materials that are in no way responsive to or necessary to the answers requested in the interrogatories as a condition to designating the actual interrogatory responses. UPS should not be allowed one more opportunity to put additional material into evidence in this record through the artifice of attaching unrelated materials to their proper responses to interrogatories propounded in accordance with the rules of this proceeding.

Therefore, PSA moves to strike the following portions of UPS' responses to PSA/UPS-ST1 and 2:

1. In UPS' response to PSA/UPS-ST1-1, strike the paragraph after the Table. (The information added in that paragraph was not requested in the interrogatory; nor is it in any way required to explain the numbers that are provided by the filling in of the blanks in the Table presented.)

2. In UPS' response to PSA/UPS-ST1-2, strike the following:

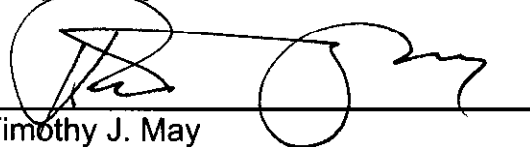
(a) Strike the first sentence in the response to 2 (c) and (d). (The witness was not asked about FY 1998.)

(b) In the response to 2 (f), after the word "were" in the first line delete: "approximately 150 million pieces of Standard (A) Single-Piece-Mail in GFY 1998 and". (The witness was not asked about GFY 1998.)

(c) In the response to 2 (g), strike the second and third sentences. (This information was not requested by the interrogatory.)

(d) In the response to 2 (j) strike the second and third sentences. This information was not requested by the interrogatory.

Respectfully submitted,

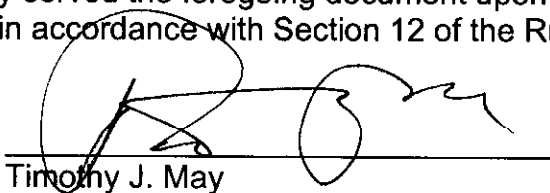


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Dated: September 1, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



Timothy J. May

Dated: September 1, 2000