

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**UNITED STATES POSTAL SERVICE MOTION FOR INCLUSION OF STATEMENT
BY WITNESS CAMPBELL INTO THE EVIDENTIARY RECORD
(September 6, 2000)**

In accordance with section 3001.30(g) of the Rules of Practice and Procedure, the United States Postal Service hereby moves for admission into evidence the attached statement by witness Chris F. Campbell.

On August 24, 2000, during cross-examination on his rebuttal testimony (USPS-T-23), witness Campbell was asked by counsel for KeySpan Energy to accept – subject to check – that, at a July 12, 2000, Mailers' Technical Advisory Committee (MTAC) meeting attended by Mr. Campbell, certain statements were made by a Postal Service headquarters operations specialist regarding Qualified Business Reply Mail accounting practices. See Tr. 39/17606.

Witness Campbell, who does not recall the statements attributed to postal personnel by KeySpan counsel having been made, has since contacted the three Postal Service headquarters operations specialists who were at the July 12th MTAC meeting. As reflected in the attached statement, all three have denied to him having made the statements alleged by KeySpan counsel. As indicated in witness Campbell's statement, one of the specialists recalls making a different, unrelated statement regarding QBRM accounting practices which apparently and, presumably, inadvertently, has suffered from imperfect recall or re-telling. In summary, witness Campbell has checked and cannot accept as accurate or valid the statement described to him on August 24th.

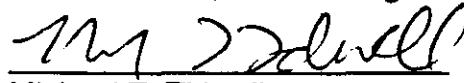
The record should be clear and accurate about what was and was not said at the July 12th meeting. Accordingly, the Postal Service moves that the attached statement by witness Campbell be entered into evidence.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
Tel: (202) 268-2998/ Fax: -5402
September 6, 2000

**STATEMENT BY CHRIS F. CAMPBELL
ON BEHALF OF UNITED STATES POSTAL SERVICE**

On August 24, 2000, Michael Hall, representing KeySpan Energy, cross-examined me before the Postal Rate Commission concerning my rebuttal testimony (USPS-RT-23). During cross-examination, Mr. Hall asked me whether or not I recalled a discussion at a July 12, 2000 MTAC meeting concerning Business Reply Mail (Tr. 39/17606). Specifically, Mr. Hall inquired if I recalled one or more Postal Service operations personnel at the meeting providing "a break-point number above which hand-counting [QBRM pieces] was no longer efficient." I stated that I did not recall such a statement (Tr. 39/17606). Mr. Hall proceeded to ask me whether or not I would accept "subject to check with...[my] own people that that number was approximately 200 to 300 [QBRM] pieces per day." I accepted the statement subject to check (Tr. 39/17607).

Since my August 24, 2000 cross-examination by Mr. Hall, I have spoken with the three Postal Service operations personnel who attended the July 12, 2000 meeting (Kerry Troxel, Operations Support, Barbara McGinnis, P&DC Operations, and Patrick Killeen, P&DC Operations). All three deny making the statement regarding "a break-point number above which hand-counting was no longer efficient." Furthermore, all three deny making any statement to the effect that any such break-point "number was approximately 200 to 300 pieces per day."

Ms. Troxel indicated that she might have stated that sites having 200 to 300 accounts that manually count QBRM pieces may find it more efficient to count QBRM pieces for one large account using an automated method.

DECLARATION

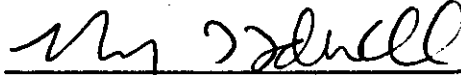
I, Chris F. Campbell, declare under penalty of perjury that the foregoing statement is true to the best of my knowledge, information and belief.

Chris F. Campbell
Chris F. Campbell

Dated: 9-6-00

CERTIFICATE OF SERVICE

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



Michael T. Tidwell

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