

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED
OCT 29 4 50 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

COMMENTS OF UNITED PARCEL SERVICE ON
THE IMPACT OF CASES PENDING BEFORE
THE COMMISSION ON THE OMNIBUS RATE CASE
(October 29, 2001)

United Parcel Service ("UPS") provides its comments in response to Commission Order No. 1324 on the impact of other cases pending before the Commission on the ability of the Commission and the participants to effectively address the Postal Service's request for changes in rates and fees in Docket No. R2001-1.

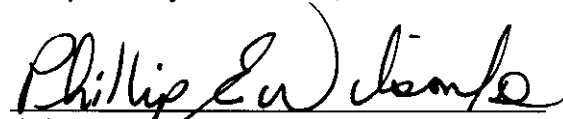
Participation in a rate case is extraordinarily demanding even under ordinary circumstances. The sheer volume of testimony is considerable, even for participants who typically only actively examine a small number of issues. The process of understanding the Postal Service's complex costing, operational, and forecasting processes and then formulating and suggesting alternatives, is made all the more difficult by the ten month statutory deadline imposed on the Commission. To be actively involved in a rate case normally precludes active involvement in other dockets pending before the Commission. Moreover, as the Presiding Officer's comments at the

prehearing conference indicate, the present circumstances in which the Postal Service finds itself potentially make this rate case even more significant than usual.

UPS believes that the Commission and the parties should make every effort to focus on the rate case. As a result, UPS will shortly file a motion in its complaint case, Docket No. C99-1 (Complaint on PostECS), to suspend further proceedings in that case until this rate case is fully resolved. By suspending further proceedings in the PostECS case until conclusion of the rate case, the Commission will enable all participants to concentrate on the rate case and thereby focus on the most important issue confronting the Commission – ensuring a fiscally sound Postal Service.

UPS is aware that the PostECS case has been pending before the Commission for an extended period of time. Nevertheless, some additional delay is acceptable, given the other demands confronting the Commission and the parties.

Respectfully submitted,

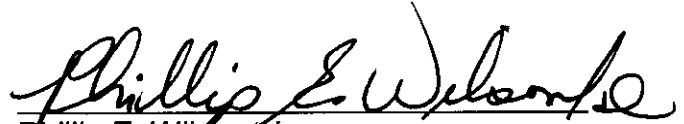


John E. McKeever
Phillip E. Wilson, Jr.
Attorneys for United Parcel Service

PIPER MARBURY RUDNICK
& WOLFE LLP
3400 Two Logan Square
18th and Arch Streets
Philadelphia, PA 19103
(215) 656-3300
and
1200 19th Street, N.W.
Washington, DC 20036
(202) 861-3900

CERTIFICATE OF SERVICE

I hereby certify that on this date I have caused to be served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.


Phillip E. Wilson, Jr.

Dated: October 29, 2001
Philadelphia, PA

90065