

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on Post E.C.S.

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Docket No. C99-1

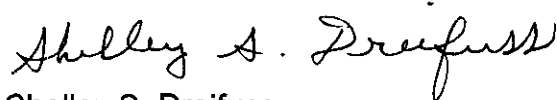
OFFICE OF THE CONSUMER ADVOCATE  
RESPONSE IN SUPPORT OF UNITED PARCEL SERVICE  
MOTION TO SUSPEND PROCEEDINGS  
(November 9 , 1999)

On November 8, 2001, United Parcel Service ("UPS") filed a Motion to Suspend Proceedings in the instant docket. UPS correctly observed that "suspension of proceedings in this case is necessary to allow the Commission and the parties to focus on the rate case." The Office of the Consumer Advocate ("OCA") shares this view. Like UPS and the Postal Service, OCA is now moving along parallel tracks in the omnibus rate proceeding—continuing to litigate the rate case, now in the discovery stage, and holding meetings with other participants in an effort to achieve a settlement. Vigorous litigation in still another proceeding, the Post ECS complaint case, severely taxes the resources of the participants and the Commission.

Since UPS has not yet presented its direct case, the participants and the Commission have not yet embarked on the next distinct phase in the instant complaint proceeding, i.e., UPS's evidentiary presentation on the question whether Post ECS is a "postal service." Thus, Docket No. C99-1 is at a natural breakpoint. OCA fully supports

UPS's request to resume proceedings in the instant docket after Docket No. R2001-1 has been completed.

Respectfully submitted,

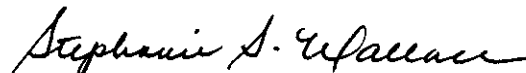


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#### CERTIFICATE OF SERVICE

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.

  
Stephanie S. Wallace

Washington, D.C. 20268-0001  
November 9, 1999