BEFORE THE POSTAL RATE COMMISSION

POSTAL RATE AND FEE CHANGES, 2001 :

DOCKET NO. R2001-1

NOTICE OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION AND DESIGNATION OF WRITTEN CROSS-EXAMINATION OF POSTAL SERVICE WITNESS KAREN MEEHAN (USPS-T-11) BY UNITED PARCEL SERVICE (December 12, 2001)

United Parcel Service hereby gives notice that it intends to conduct oral cross-

examination of Postal Service witness Karen Meehan (USPS-T-11) on the subjects of

PMPC costs, Sales function costs, and call center costs.

United Parcel Service designates as written cross-examination of Postal Service

witness Meehan the following interrogatory responses of Ms. Meehan:

1. PSA/USPS-T40-3(a) and (b) (redirected from witness Cochrane); and

2. UPS/USPS-T11-1 through UPS/USPS-T11-6, and UPS/USPS-T11-8.

Respectfully submitted,

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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.

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John E. McKeever Attorney for United Parcel Service

Dated: December 12, 2001 Philadelphia, Pa.