

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**MOTION OF UNITED PARCEL SERVICE FOR DESIGNATION
OF WRITTEN CROSS-EXAMINATION OF UNITED STATES
POSTAL SERVICE WITNESS JOSEPH D. MOELLER (USPS-T-28)
(January 9, 2002)**

United Parcel Service hereby moves that the Presiding Officer accept the designation of the interrogatory responses identified on Attachment A hereto as written cross-examination of United States Postal Service witness Joseph D. Moeller (USPS-T-28), on the grounds stated below.

Mr. Moeller was originally scheduled to testify on January 15, 2002. Thus, designations of written cross-examination on his testimony would have been due on January 10, 2002. However, pursuant to Presiding Officer's Ruling No. R2001-1/30 (January 9, 2002), Mr. Moeller is now scheduled to testify on January 11, 2002, and designations of written cross-examination would therefore ordinarily have been due on January 8. Since the ruling rescheduling Mr. Moeller's appearance was not issued until January 9, it was not possible to designate written cross-examination by January 8.

WHEREFORE, United Parcel Service respectfully requests that the Presiding Officer accept the designation of the interrogatory responses identified on Attachment A

hereto as written cross-examination of United States Postal Service witness Joseph D. Moeller (USPS-T-28).

Respectfully submitted,

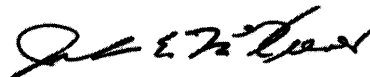


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CERTIFICATE OF SERVICE

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.



John E. McKeever
Attorney for United Parcel Service

Dated: January 9, 2002
Philadelphia, Pa.

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MOELLER DESIGNATIONS

1. ABA&NAPM/USPS-T29-19(b)-(c) and 34 (both redirected from witness Robinson)
2. NAA/USPS-T28-1
3. OCA/USPS-T28-1(c)-(g), 5, 6, and 9
4. POIR No. 2, Question 6 and Question 7
5. POIR No. 5, Question 4
6. UPS/USPS-T28-1, 2, 4, 13, 16, 17, 21, 31, 38, 39, and 47