

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

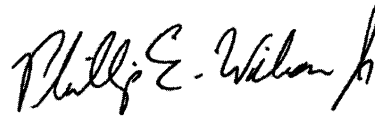
**MOTION OF UNITED PARCEL SERVICE TO SUPPLEMENT THE
DESIGNATION OF WRITTEN CROSS-EXAMINATION OF
UNITED STATES POSTAL SERVICE WITNESS
JOSEPH D. MOELLER (USPS-T-28)
(January 16, 2002)**

United Parcel Service hereby moves that the Presiding Officer accept the supplemental designation of the revised response of United States Postal Service witness Joseph D. Moeller (USPS-T-28) to Presiding Officer's Information Request No. 2, Question 6, as written cross-examination of witness Moeller, on the grounds stated below.

UPS filed a motion to designate written cross-examination of witness Moeller on January 9, 2002. In that motion, UPS requested that the Presiding Officer accept witness Moeller's response to Presiding Officer's Information Request No. 2, Question 6, as written cross-examination. On January 11, 2002, the Postal Service filed a revision to witness Moeller's response to that question. UPS requests that both the original response and the revised response be designated as written cross-examination of witness Moeller and that both be incorporated into the record of this proceeding.

WHEREFORE, United Parcel Service respectfully requests that the Presiding Officer accept the supplemental designation of the revised response of United States Postal Service witness Joseph D. Moeller (USPS-T-28) to Presiding Officer's Information Request No. 2, Question 6, filed January 11, 2001, as written cross-examination of witness Moeller.

Respectfully submitted,

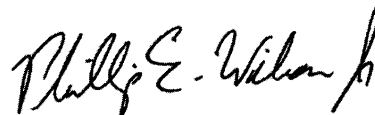


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CERTIFICATE OF SERVICE

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.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: January 16, 2002
Philadelphia, PA
3583527