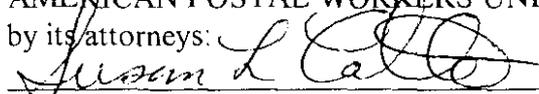


that, in light of its substantial interest in the procedural mechanisms and schedules as the only party currently on record in opposition to the proposed settlement, APWU's motion should be granted.

Respectfully submitted,

AMERICAN POSTAL WORKERS UNION, AFL-CIO

by its attorneys:



Susan L. Catler

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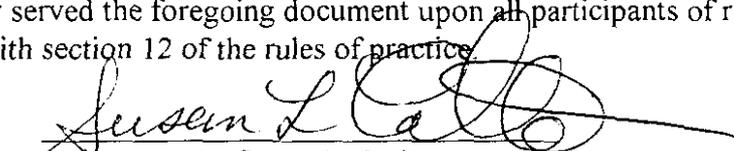
(202) 898-1707/FAX (202) 682-9276

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Date: January 24, 2002


Susan L. Catler