

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

**EXPERIMENTAL RATE AND SERVICE CHANGES  
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT  
WITH CAPITAL ONE SERVICES, INC.**

**Docket No. MC2002-2**

**AMERICAN POSTAL WORKERS UNION, AFL-CIO  
DESIGNATION OF WRITTEN CROSS-EXAMINATION OF  
USPS WITNESS MICHAEL K. PLUNKETT (USPS-T2)**

(December 2, 2002)

Pursuant to Rule 30(e)(2), the American Postal Workers Union, AFL-CIO ("APWU") designates the following responses of USPS witness Michael K. Plunkett (USPS-T2) as its written cross-examination of this witness:

APWU/USPS-T2: 1 – 3, 5 - 7, 10  
APWU/USPS-T1: 1, 4, 5 (redirected from Bizzotto)  
OCA/USPS-T2: 9, 26, 27, 28, 29, 30

Two copies of the designated interrogatories and the responses thereto are submitted to the Commission with this designation.

Respectfully submitted,

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Counsel for American Postal Workers Union, AFL-CIO

**CERTIFICATION**

I hereby certify that I have this date served the foregoing document in accordance with the rules of practice.

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