

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997]

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DOCKET NO. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

REQUEST FOR ORAL CROSS-EXAMINATION OF USPS WITNESSES. FOR A
SCHEDULING REQUEST, AND TO REQUEST THE ABILITY TO CROSS-EXAMINE
WITNESSES REMOTELY BY TELEPHONE

1. This is to advise the Commission that I am requesting the opportunity to conduct oral cross-examination of the following witnesses of the United States Postal Service:

T-39	Susan W. Needham	Moderate
T-40	Michael K. Plunkett	Moderate

2. I will be in Washington, DC for another reason on Monday afternoon, October 6, 1997. Therefore, I would like to request that these two witnesses be scheduled on Tuesday, October 7, 1997 as a first choice, Wednesday, October 8, 1997 as a second choice, and Monday morning, October 6, 1997 as a third choice. This would allow me to combine both of my trips to Washington into a single cost-effective trip. Since this request is being filed early to make my desires known, I request that if the Postal Service witness will not be available at these times, that they indicate the reasons why in their filing.

3. If witness T-33 Thomas M. Sharkey can be scheduled at this time, I would have light cross-examination of him, however, that is not my primary concern as is the cross-examination of witnesses T-39 and T-40.

4. Intervenor Douglas F. Carlson has indicated that I may note that he will be also requesting oral cross-examination of Witness Needham and Plunkett and that his availability will be limited to the same time frame as mine.

5. The amount of oral cross-examination and the witnesses desired may change as a result of the responses that I receive to the interrogatories that I am filing contemporaneously with this pleading.

6. Because I am located some distance from Washington, I would like to request the ability to conduct cross-examination of some of the Postal Service witnesses by a telephone connection. While I realize that I would be at a disadvantage by not being able to see the facial and body language in the responses of the witness, I still feel that I would be able to obtain information useful for the evaluation of the case and preparation of my future activity in this Docket. The use of the telephone would not prejudice the activity of any other intervenor nor that of the witness. Furthermore, it would allow for out-of-town intervenors, especially those who are individuals, to increase their ability to participate in these proceedings without forcing them to expend excessive funds and time that would be required to be in Washington for part or all of a close to three-week period.

Respectfully submitted,

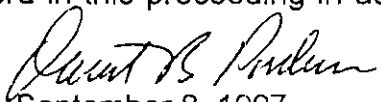


David B. Popkin, Post Office Box 528, Englewood, NJ 07631-0528

September 8, 1997

CERTIFICATE OF SERVICE

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



David B. Popkin

September 8, 1997