

POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
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POSTAL RATE AND FEE CHANGES, 1997

MOTION OF AMERICAN PUBLIC POWER ASSOCIATION  
TO INTERVENE AS A FULL PARTICIPANT

The AMERICAN PUBLIC POWER ASSOCIATION (APPA) hereby moves to intervene late as a Full Participant in the above-referenced proceeding in accordance with Section 20 of the Commission's Rules of Practice.

**APPA Persons To Be Served**

The names and addresses of the persons who are to be served on behalf of APPA in this proceeding are as follows:

Eugene E. Threadgill  
1493 Chain Bridge Rd.  
Suite 200  
McLean, VA 22101  
(703) 734-1918

Deborah Penn  
Assistant Executive Director,  
Information Services  
American Public Power Association  
2301 M St. N.W.  
Washington, DC 20037  
(202) 467-2956

Pursuant to Section 25 of the Commission's Rules of Practice, APPA hereby requests that it be served with all interrogatories and answers thereto, as well as with all other documents filed in this proceeding.

**Interest of APPA**

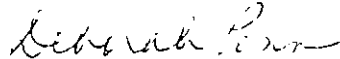
APPA is the national service organization representing municipal and other state and local government-owned electric utilities in the United States. Publicly owned electric utilities serve more than 16 million customers in the United States, and mail more than 190 million bills annually to their customers. The members of APPA will be seriously impacted by the proposed disproportionate increases in the rates for presorted letters and cards.

**Participation in Hearing**

APPA accepts all rulings which have been issued to date, and will not challenge any rulings, or ask for deferral of any procedure, on the basis of its late intervention. APPA intends to actively participate in hearings which may be held herein. Accordingly, APPA submits that its participation will be in the public interest, and requests permission to intervene late in this proceeding.

Respectfully submitted,

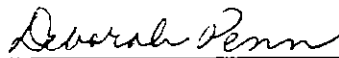
American Public Power Association



Deborah Penn  
Assistant Executive Director,  
Information Services  
American Public Power Association

**CERTIFICATE OF SERVICE**

I, Deborah Penn, American Public Power Association, hereby certify that, this 18th day of September, 1997, I have served six copies of the foregoing document upon the United States Postal Service, and a copy upon all parties on the Secretary's list of intervenors in this proceeding, in accordance with Section 12 of the Rules of Practice.



Deborah Penn  
Assistant Executive Director,  
Information Services  
American Public Power Association