

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

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

SUPPLEMENTAL TESTIMONY
OF
PAUL M. LION
ON BEHALF OF THE
UNITED STATES POSTAL SERVICE

SUPPLEMENTAL TESTIMONY OF PAUL M. LION

I am the same Paul M. Lion whose direct testimony was admitted into evidence in Postal Rate Commission Docket No. R97-1. Tr. 3/1059. The purpose of this supplemental testimony is to sponsor Library Reference H-188, which contains material such as hard and soft copy spreadsheets and SAS programs that support my direct testimony and the tables presented therein.

The procedural history of LR-H-188 begins with its filing together with the Postal Service Request and direct case on July 10, 1997. It was revised on August 11, 1997 in conjunction with revisions to my testimony. In response to an interrogatory requesting the electronic spreadsheets underlying Tables 12 and 13 of my direct testimony, as revised on August 11, 1997, a supplement to LR-H-188 containing the requested material was filed on September 2, 1997. (Since all that changed was one piece of the formula driving a single spreadsheet cell, I had assumed that revised electronic copies were unnecessary. See Tr. 3/1135.) That interrogatory was designated as written cross-examination and incorporated into the transcript. *Id.*

The materials contained in LR-H-188 were created and assembled by me or by colleagues working under my direction and control. In this respect, I have at all times been the sponsor of this library reference; I hereby adopt it as my testimony.