

ORIGINAL

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

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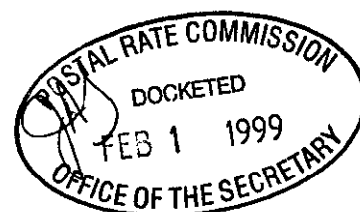
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Docket No. MC98-1

PITNEY BOWES REQUEST FOR OPPORTUNITY
TO CONDUCT AND NOTICE OF INTENTION TO CONDUCT
CROSS-EXAMINATION OF USPS WITNESSES
LIM, PLUNKETT AND SECKAR

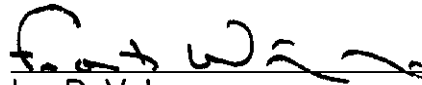
In response to the revised hearing scheduled issued by the Commission on December 2, the Postal Service filed the Supplemental Direct Testimony of Chong Bum Lim on behalf of the United States Postal Service on January 14, 1999. On the same day, the Postal Service filed a revised response of Mr. Plunkett to an OCA interrogatory (OCA/USPS-T5-10) and question 2 of POIR No. 2 and a revision by Mr. Seckar to a question posed by Presiding Officer LeBlanc during hearings. The later two submissions conform earlier information supplied by the Postal Service witnesses concerning information systems costs to Mr. Lim's new IS cost numbers.

Mr. Lim's testimony is plainly entirely new and requires an opportunity for cross-examination. The derivative works of Mr. Plunkett and Mr. Seckar are equally new and have not been subject to examination by any party. Pitney Bowes has submitted



interrogatories to each of these witnesses and requests the opportunity to conduct follow-up oral cross-examination of them.

Respectfully submitted,



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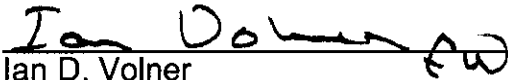
Counsel to Pitney Bowes Inc.

DC1:88141

CERTIFICATE OF SERVICE

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

DATE: February 1, 1998



Ian D. Volner