

ORIGINAL

UNITED STATES OF AMERICA

FEDERAL TRADE COMMISSION

ambiguous, and uncertain. Notwithstanding these objections, Complaint Counsel have responded to the Request as they understand and interpret them. Complaint Counsel reserve the right to amend or supplement their responses should Respondent assert a different interpretation of the Request.

4. Complaint Counsel's discovery and investigation in this matter are continuing. Although Complaint Counsel undertake no obligation to supplement any of these responses, Complaint Counsel reserve the right to assert additional objections as appropriate, and to amend or supplement these objections and responses as necessary.

5. Complaint Counsel object to Respondent's Demand to the extent that it calls for

REQUEST FOR ADMISSION #3

You have no knowledge of any claim by any person alleging economic harm by reason of a rate, charge, or other item contained in the Tariff.

REQUEST FOR ADMISSION #4

RESPONSE: Deny, subject to the response provided in Response to Interrogatory #7.

REQUEST FOR ADMISSION #8

notice regarding tariff rates published in connection with any proceeding before the Oregon

Department of Transportation.

RESPONSE: Admit, subject to the response and objection raised in Response to Interrogatory #8.

REQUEST FOR ADMISSION #9

RESPONSE: Deny, subject to the response and objections raised in Response to Interrogatory #12.

REQUEST FOR ADMISSION #13

You have conducted no investigation of intrastate collective ratemaking by household goods movers in States other than OR, KY, AL, MN, MS, and IA within the last five (5) years.

Interrogatory #13.

REQUEST FOR ADMISSION #14

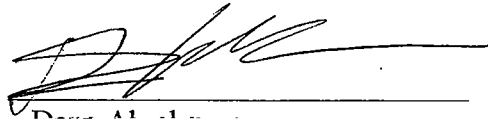
You have communicated with no Member of the Kentucky Association or any person associated with any such Member in connection with this proceeding or the investigation which

REQUEST FOR ADMISSION #16

You have conducted no investigation which would disclose the harm to the Kentucky moving public which would result from the granting of the relief sought in the Complaint.

RESPONSE: Deny, subject to the response and objections raised in Response to Interrogatory #16.

Respectfully submitted,



A handwritten signature in black ink, appearing to be "D. J. [unclear]", written over a horizontal line.

Counsel Supporting the Complaint
Bureau of Competition
Federal Trade Commission
Washington, D.C. 20580
(202) 326-2096
Facsimile (202) 326-3496

Dated: December 2, 2003

CERTIFICATE OF SERVICE

FILE NO. 00-1117 D. C. 10-0000 F. I. C. 10-1117-1117

Counsel's Response to Respondent's First Request for Admissions to be served upon the following persons by facsimile, U.S. Mail or Hand-Carried:

The Honorable D. Michael Chappell
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, DC 20530