

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-1-2)

The United States Postal Service hereby provides responses to the following interrogatories of United Parcel Service: UPS/USPS-1-2, filed on September 3, 1996. An objection to interrogatory UPS/USPS-3 was filed on September 13, 1996.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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September 17, 1996



**U.S. POSTAL SERVICE RESPONSE TO INTERROGATORIES OF
UNITED PARCEL SERVICE**

**UPS/USPS-1
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UPS/USPS-1. Please refer to your response to OCA/USPS-29 and explain which CAG/finance numbers are grouped together for purposes of this process. That is, does each CAG form its own pool for purposes of calculating average dollar weight?

UPS/USPS-1 Response:

The CAG/craft cost pools exhibited in the attachment to the response to OCA/USPS-53 are used for purposes of calculating average dollar weight.

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**UPS/USPS-2
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UPS/USPS-2. Please refer to your response to OCA/USPS-26 and confirm that no offices have moved from CAG A to a lower-ranked CAG (B-J) from 1993 to 1995. If you cannot confirm, please explain in full.

UPS/USPS-2 Response:

Confirmed . Also see the response to OCA/USPS-69 for a definition of what is included in the IOCS CAG A and B cost pools.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Susan M. Duchek

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