

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

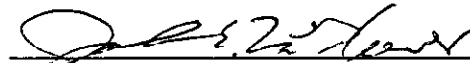
POSTAL RATE AND FEE CHANGES, 2000 :
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DOCKET NO. R2000-1

FIRST SET OF INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS FROM
UNITED PARCEL SERVICE TO UNITED STATES
POSTAL SERVICE WITNESS TOLLEY
(UPS/USPS-T6-1 through 4)
(January 21, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Tolley (UPS/USPS-T6-1 through 4).

Respectfully submitted,



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Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS TOLLEY

UPS/USPS-T6-1. Refer to page 154 of your testimony at line 24, where you state, "The estimated own-price elasticity of Parcel Post volume in the period is -1.229." Please define what period of time you are referring to when you use the phrase "in the period" in that sentence.

UPS/USPS-T6-2. Refer to page 154 of your testimony at lines 26-27, where you refer to "the estimated long-run price elasticity." Please provide the numerical value of the "estimated long-run price elasticity" to which you there refer.

UPS/USPS-T6-3. Refer to page 155 of your testimony, at lines 4-7, where you state that "Parcel Post is used most heavily by residential customers."

(a) Is it your testimony that most Parcel Post volume is sent by residential mailers?

(b) Is it your testimony that most Parcel Post volume is delivered to residential customers?

(c) Provide for BY 1998 (i) the volume of Parcel Post that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses.

(d) Provide by rate category (inter-BMC, intra-BMC, DBMC, DSCF, and DDU) the volume of Parcel Post that was sent to residential customers in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide by rate category (inter-BMC, intra-BMC, DBMC, DSCF, and DDU) the volume of Parcel Post that was sent by residential customers in BY 1998.

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If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide by rate category (inter-BMC, intra-BMC, DBMC, DSCF, and DDU) the volume of Parcel Post that was sent by businesses to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(g) Provide by rate category (inter-BMC, intra-BMC, DBMC, DSCF, and DDU) the volume of Parcel Post that was sent by businesses to residential customers in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(h) Provide by rate category (inter-BMC, intra-BMC, DBMC, DSCF, and DDU) the volume of Parcel Post that was sent by residential customers to residences in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(i) Provide by rate category (inter-BMC, intra-BMC, DBMC, DSCF, and DDU) the volume of Parcel Post that was sent by residential customers to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(j) Provide for all of Parcel Post the volume that was sent by businesses to residences in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

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(k) Provide for all of Parcel Post the volume that was sent by businesses to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(l) Provide for all of Parcel Post the volume that was sent by residential customers to businesses in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

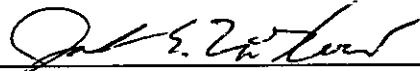
(m) Provide for all of Parcel Post the volume that was sent by residential customers to residences in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

(n) Provide for all of Parcel Post the volume that was accepted via window service in BY 1998. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T6-4. Refer to page 155 of your testimony at lines 1-11. Does the 18.54% increase in the volume of Parcel Post referred to by you on line 11 include the 9.90% increase in Parcel Post volume referred to by you at lines 2-3, or is the 18.54% increase on top of (in addition to) the 9.90% increase?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



John E. McKeever
Attorney for United Parcel Service

Dated: January 21, 2000
Philadelphia, Pa.