

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

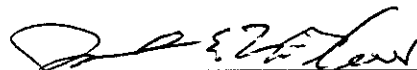
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FIRST SET OF INTERROGATORIES FROM
UNITED PARCEL SERVICE TO UNITED STATES
POSTAL SERVICE WITNESS HUNTER
(UPS/USPS-T5-1 through 5)
(January 21, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Hunter (UPS/USPS-T5-1 through 5).

Respectfully submitted,



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

UPS/USPS-T5-1. Refer to page 2 of your testimony at lines 13-14, where you state, "The BRPW provides estimates of revenue and volume totals where bulk mail categories correspond to the Postal Service's revenue accounting system." Confirm that this sentence refers to a situation where revenue accounts are associated with specific classes or subclasses of mail. If you do not confirm, explain why you cannot confirm that statement, and indicate what you mean when you refer to situations "where bulk mail categories correspond to the Postal Service's revenue accounting system."

UPS/USPS-T5-2. Refer to Tables 1, 2, and 3 of your testimony. Provide, in the same format as and for each of the same categories of mail shown in Tables 1, 2, and 3 of your testimony, that part of the revenue, piece, and weight estimates that are derived solely from the BRPW system.

UPS/USPS-T5-3. Refer to page 3 of your testimony at lines 1-6. In the case of each category of mail for which revenue and volume (pieces or weight) estimates are derived using the BRPW system, identify all of the post offices included in the "ongoing panel of post offices comprised of automated bulk mail entry post offices under the Permit System" (see lines 4-5 on page 3 of your testimony).

UPS/USPS-T5-4. Refer to page 3 of your testimony at lines 1-6, where you refer to "a supplemental stratified random sample of non-automated post offices." In the case of each mail category for which the BRPW system is used to estimate revenue and volume (pieces or weight), identify (a) all of the non-automated post offices from which the supplemental stratified random sample is drawn, and (b) all of the non-

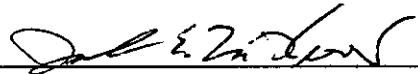
INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS HUNTER

automated post offices that were included in the supplemental stratified random sample used to derive the estimates contained in your Tables 1, 2, and 3.

UPS/USPS-T5-5. Refer to page 3 of your testimony at lines 7-11. Why is the same form (PS Form 3605) used to report revenue and volume data both for Standard Mail (B) and for Priority Mail?

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.