

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

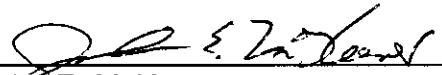
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FIRST SET OF INTERROGATORIES FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS PAFFORD  
(UPS/USPS-T4-1 through 6)  
(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 Pafford (UPS/USPS-T4-1 through 6).

Respectfully submitted,

  
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Of Counsel.

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

UPS/USPS-T4-1. Refer to your testimony at page 3, lines 16-17, where you state, "the Postal Service's postage revenue accounting system contains several accounts that are associated with specific classes or subclasses of mail." Identify each such account and the specific classes or subclasses of mail with which each is associated.

UPS/USPS-T4-2. Refer to page 3 of your testimony at lines 18-19, where you state, "[M]ost postage revenue accounts are general accounts that do not correspond exactly with specific mail categories." Identify, and describe the differences between or among, all "postage revenue accounts . . . that do not correspond exactly with specific mail categories," and in the case of each such account, state all of the mail categories associated with the account.

UPS/USPS-T4-3. Refer to page 6 of your testimony at lines 15-17, where you state that DRPW and BRPW estimates "are combined with other data in the RPW Adjustment System to produce estimates of revenue, pieces and weight for all categories of mail." Identify and produce all such "other data" in the RPW Adjustment System that is used "to produce estimates of revenue, pieces and weight" for Parcel Post, and provide the source of all such data.

UPS/USPS-T4-4. Refer to Tables 1, 2, and 3 on pages 8-13 of your testimony. In the case of each table, explain why the coefficient of variation was not calculated for Express Mail.

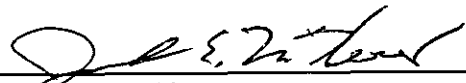
INTERROGATORIES OF UNITED PARCEL SERVICE  
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UPS/USPS-T4-5. In all instances where DRPW and BRPW estimates are combined (whether with or without other data) to produce estimates of revenue, pieces, or weight for a category of mail, describe all steps that are taken to make sure that mail covered by the BRPW system is not also sampled in the DRPW system.

UPS/USPS-T4-6. 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, that part of the revenue, piece, and weight estimates that are derived solely from the DRPW system.

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.

  
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John E. McKeever  
Attorney for United Parcel Service

Dated: January 21, 2000  
Philadelphia, Pa.