

BEFORE THE  
POSTAL RATE COMMISSION

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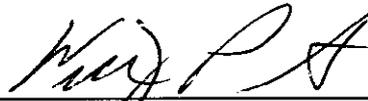
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FIRST SET OF INTERROGATORIES FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS MUSGRAVE  
(UPS/USPS-T8-1 through 3)  
(February 3, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Musgrave (UPS/USPS-T8-1 through 3).

Respectfully submitted,



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Of Counsel.

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

UPS/USPS-T8-1. (a) Is most Priority Mail volume sent by residential mailers?

(b) Is most Priority Mail volume delivered to residential customers?

(c) Is most Priority Mail volume either delivered to or sent by residential mailers?

(d) Is most Priority Mail volume sent by business mailers?

(e) Is most Priority Mail volume delivered to business customers?

(f) Is most Priority Mail volume either delivered to or sent by business mailers?

(g) Provide for BY 1998 (i) the volume of Priority Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(h) Provide for BY 1998 (i) the volume of Priority Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(i) Provide for Priority Mail 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.

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

(j) Provide for Priority Mail 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.

(k) Provide for Priority Mail 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.

(l) Provide for Priority Mail 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.

UPS/USPS-T8-2. Refer to page 21 of your testimony, at lines 11-12, where you state, "[o]wn-price elasticity is estimated to be equal to -0.82 (-0.819), and is statistically significant with an estimated  $t = -5.47$ ." Please define what period of time you are referring to for this estimation.

UPS/USPS-T8-3. (a) Is most Express Mail volume sent by residential mailers?

(b) Is most Express Mail volume delivered to residential customers?

(c) Is most Express Mail volume either delivered to or sent to residential mailers?

(d) Is most Express Mail volume sent by business mailers?

(e) Is most Express Mail volume delivered to business customers?

(f) Is most Express Mail volume either delivered to or sent by business mailers?

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

(g) Provide for BY 1998 (i) the volume of Express Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

(h) Provide for BY 1998 (i) the volume of Express Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(i) Provide the volume of Express Mail 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.

(j) Provide the volume of Express Mail 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.

(k) Provide the volume of Express Mail 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.

(l) Provide the volume of Express Mail 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.

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.

  
\_\_\_\_\_  
William J. Pinamont  
Attorney for United Parcel Service

Dated: February 3, 2000  
Philadelphia, Pa.

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