

BEFORE THE  
POSTAL RATE COMMISSION

RECEIVED  
FEB 23 9 17 AM '00

POSTAL RATE COMMISSION  
OFFICE OF THE CLERK

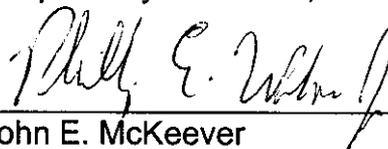
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS FROM UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
(UPS/USPS-T34-13 through 15)  
(February 23, 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 Robinson: UPS/USPS-T34-13 through 15.

Respectfully submitted,



John E. McKeever  
William J. Pinamont  
Phillip E. Wilson, Jr.  
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP  
3400 Two Logan Square  
18th & Arch Streets  
Philadelphia, PA 19103-2762  
(215) 656-3310  
(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW  
Washington, DC 20036-2430  
(202) 861-3900

Of Counsel.

INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS ROBINSON

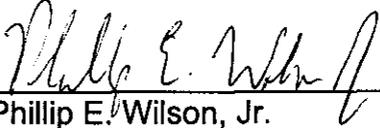
UPS/USPS-T34-13. The Final Adjustment for Delivery Confirmation amounts for Air Transportation and Surface Transportation listed in Attachment K to USPS-LR-I-165 are not contained in the source cited, USPS-LR-127, Chapter XV. Identify the source and provide the relevant source document if it has not already been provided.

UPS/USPS-T34-14. Provide the source of the assumptions used in Rate Design Assumptions -- Target Cost Coverage of 184% in USPS-LR-I-165, Input Data worksheet.

UPS/USPS-T34-15. Provide the Special Weight Report -- FY 1998 Priority Mail by Ounce referred to in USPS-LR-I-165, Input Data and Att B tabs.

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.

  
\_\_\_\_\_  
Phillip E. Wilson, Jr.  
Attorney for United Parcel Service

Dated: February 23, 2000  
Philadelphia, Pa.

59501