

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

INTERROGATORIES FROM UNITED PARCEL
SERVICE TO UNITED STATES POSTAL
SERVICE WITNESS DEGEN
(UPS/USPS-T16-2 through 4)
(February 23, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Degen: UPS/USPS-T16-2 through 4.

Respectfully submitted,


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

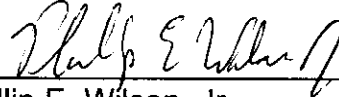
UPS/USPS-T16-2. Refer to Table 8 at page 66 of your testimony. Provide the FY95 IOCS Platform distribution key for items in containers for all individual mail subclasses.

UPS/USPS-T16-3. Provide all computer codes and log files used to generate USPS LR-I-138, PRC Version/MODS-Based Costing, SAS Outputs and Spreadsheets.

UPS/USPS-T16-4. Refer to USPS LR-I-12, Appendix H, page 3, which states that the IOCS data file provided was developed by "dropping variables not used in development of the CRA" Provide a version of the IOCS data file which includes the dropped variables.

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.

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