

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE DIVISION  
OFFICE OF THE SECRETARY

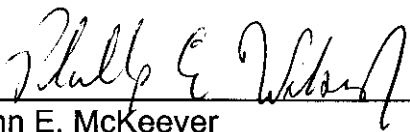
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL  
SERVICE TO UNITED STATES POSTAL  
SERVICE WITNESS BARON  
(UPS/USPS-T12-2 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  
Baron: UPS/USPS-T12-2 through 4.

Respectfully submitted,

  
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William J. Pinamont  
Phillip E. Wilson, Jr.  
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Of Counsel.

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

UPS/USPS-T12-2. Refer to witness Raymond's response to UPS/USPS-T13-4(a).

(a) Describe how the activities in steps 2, 6, 7, and 11 are assigned to parcels. Provide the citations to the appropriate calculations in the base year workpapers.

(b) If the costs of these activities are not assigned to parcels, provide an explanation as to why they are not, and provide any analyses or documentation that supports your explanation.

UPS/USPS-T12-3. Refer to witness Raymond's response to UPS/USPS-T13-5(a).

(a) Describe how this driving activity is assigned to parcels. Provide the citations to the appropriate calculations in the base year workpapers.

(b) If the cost of this activity is not assigned to parcels, provide an explanation as to why it is not, and provide any analyses or documentation that supports your explanation.

UPS/USPS-T12-4. Refer to Table 3 on page 35 of your testimony. That table includes six types of routes, only one of which is a foot route. In USPS-LR-I-80, File Cs06&7.xls, Tabs Input LR and 7.0.4.1, there are eight types of routes, including three types of foot routes: business foot, residential foot, mixed foot, business motorized, residential curb, residential park & loop, mixed curb, and mixed park & loop.

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TO UNITED STATES POSTAL SERVICE WITNESS BARON

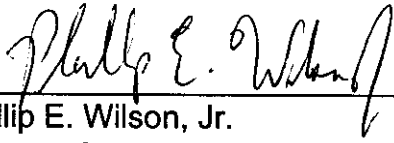
(a) Does the Engineered Standards Database and/or the City Carrier Route Master File provide sufficient information to calculate new street-time percentages for each of the three categories of foot routes?

(b) If so, why did you not calculate new street-time percentages for each of the three categories of foot routes?

(c) Provide documentation and analyses that support the use of the same street-time percentage for all three types of foot routes.

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

Dated: February 23, 2000  
Philadelphia, Pa.

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