

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
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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 PAFFORD  
(UPS/USPS-T4-8 through 10)  
(February 29, 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 Pafford: UPS/USPS-T4-8 through 10.

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 OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD

UPS/USPS-T4-8. Library Reference USPS-LR-I-30, Appendix E, shows revenue, pieces, and weight estimates multiplied by 1.00920754219 for non-automated office data, mail type "PI-SB-PARCELP."

(a) Explain why this factor is used on the parcel mail type, but not any other types.

(b) Explain in detail how this factor was developed and provide copies of all analyses and supporting documents used in the development process. Provide the information in electronic format, in originally developed form with formulas intact.

UPS/USPS-T4-9. Library Reference USPS-LR-I-30, Appendix I, states: "THIS PROGRAM CREATES THE GOVERNMENT FISCAL YEAR RPW ESTIMATES. IT ROLLS UP QUARTERS 0, 2, 3, AND 5 TO PRODUCE RPW RATE CATEGORY AND SUMMARY CATEGORY ESTIMATES."

(a) Define what months are included in quarters 0, 2, 3, and 5, separately.

(b) Are the data in these quarters only 1998 data, or are data from other years included?

(c) If data from other years are included, which other years? Why are data from other years included? Explain in detail.

(d) If data from other years are included, please provide revenue, weight, and piece proportion information for 1998 by mail category and subclass. That is, how much of the revenue, weight, and piece information in each mail category is 1998 data?

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

UPS/USPS-T4-10. Refer to Library Reference USPS-LR-I-30, Appendix J.

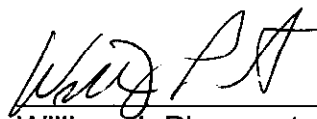
(a) Provide this file in electronic spreadsheet format with formulas intact and maintained as originally developed.

(b) Explain in detail the purpose of this file, the sources of data that are used in this file, and where the results of this file are used in RPW reporting.

(c) Are data other than 1998 data used in this file? If yes, please explain in detail why.

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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William J. Pinamont  
Attorney for United Parcel Service

Dated: February 29, 2000  
Philadelphia, Pa.