

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

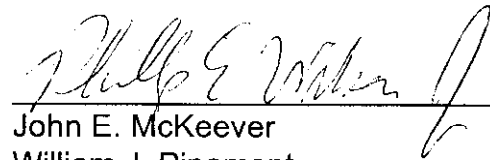
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL  
SERVICE TO UNITED STATES POSTAL  
SERVICE WITNESS MEEHAN  
(UPS/USPS-T11-7 through 18)  
(March 6, 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-T11-7 through 18.

Respectfully submitted,



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

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Of Counsel.

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

UPS/USPS-T11-7. Provide data by year and by quarter for the period from PFY 1970 through PFY 1998 on total accrued costs for Cost Segment 2, "Supervisors and Technicians." If data are not available for the full period, provide data for all periods for which data are available. If for all or part of the period data are available annually but not quarterly, provide annual totals for those portions of the specified period and quarterly data for all periods for which it is available.

UPS/USPS-T11-8. Describe any major changes that have occurred over the period from PFY 1970 through PFY 1998 in the definition of Cost Segment 2, "Supervisors and Technicians," or in the procedures for calculating these costs. Indicate also the dates on which these changes occurred.

UPS/USPS-T11-9. Provide data by year and by quarter for the period from PFY 1970 through PFY 1998 on total accrued costs for Cost Segment 2.1, "Supervision of Mail Processing." If data are not available for the full period, provide data for all periods for which data are available. If for all or part of the period data are available annually but not quarterly, provide annual totals for those portions of the specified period and quarterly data for all periods for which it is available.

UPS/USPS-T11-10. Describe any major changes that have occurred over the period from PFY 1970 through PFY 1998 in the definition of Cost Segment 2.1, "Supervision of Mail Processing," or in the procedures for calculating these costs. Indicate also the dates on which these changes occurred.

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

UPS/USPS-T11-11. Provide data by year and by quarter for the period from PFY 1970 through PFY 1998 on total accrued costs for Cost Segment 3, "Clerks and Mailhandlers, CAG A-J Post Offices." If data are not available for the full period, provide data for all periods for which data are available. If for all or part of the period data are available annually but not quarterly, provide annual totals for those portions of the specified period and quarterly data for all periods for which it is available.

UPS/USPS-T11-12. Describe any major changes that have occurred over the period from PFY 1970 through PFY 1998 in the definition of Cost Segment 3.1, "Mail Processing." If data are not available for the full period, please provide data for all periods for which data are available. If for all or part of the period data are available annually but not quarterly, please provide annual totals for those portions of the specified period and quarterly data for all periods for which it is available.

UPS/USPS-T11-13. Describe any major changes that have occurred over the period from PFY 1970 through PFY 1998 in the definition of Cost Segment 3.1, "Mail Processing," or in the procedures for calculating these costs. Indicate also the dates on which these changes occurred.

UPS/USPS-T11-14. Provide data by year and by quarter for the period from 1970 through 1998 on total accrued costs for Cost Segment 11, "Custodial and Maintenance Services." If data are not available for the full period, provide data for all periods for which data are available. If for all or part of the period data are available annually but not quarterly, provide annual totals for those portions of the specified

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

period and quarterly data for all periods for which it is available.

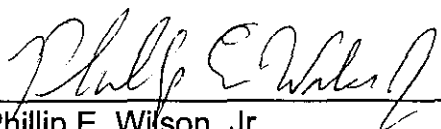
UPS/USPS-T11-15. Describe any major changes that have occurred over the period from PFY 1970 through PFY 1998 in the definition of Cost Segment 11, "Custodial and Maintenance Services," or in the procedures for calculating these costs. Indicate also the dates on which these changes occurred.

UPS/USPS-T11-16. Provide data by year and by quarter for the period from 1970 through 1998 on total accrued costs for Cost Segment 11.2, "Operating Equipment Maintenance." If data are not available for the full period, provide data for all periods for which data are available. If for all or part of the period data are available annually but not quarterly, provide annual totals for those portions of the specified period and quarterly data for all periods for which it is available.

UPS/USPS-T11-17. Describe any major changes that have occurred over the period from PFY 1970 through PFY 1998 in the definition of Cost Segment 11.2, "Operating Equipment Maintenance," or in the procedures for calculating these costs. Indicate also the dates on which these changes occurred.

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: March 6, 2000  
Philadelphia, Pa.

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