

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2000

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

INTERROGATORIES FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS PLUNKETT  
(UPS/USPS-T36-8 through 11)  
(March 7, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Plunkett: UPS/USPS-T36-8 through 11.

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 PLUNKETT

UPS/USPS-T36-8. Refer to your testimony on page 8, where you state:

“[b]ecause the Same Day Airport to Airport Service has been suspended, I have not proposed changes to the existing rates.” Why is it appropriate to leave Same Day Airport to Airport Service rates unchanged when that service may be resumed before the next rate case?

UPS/USPS-T36-9. Refer to your testimony on page 9, where you state that you “manually adjusted rates to preserve reasonable relationships between adjacent weight cells.”

(a) Explain in detail how you “manually adjusted rates to preserve reasonable relationships between adjacent weight cells,” and provide all of the specific adjustments you made.

(b) Define “reasonable relationships” as you use that term.

UPS/USPS-T36-10. Refer to your testimony on page 13, where you state: “this method would have resulted in rate increases that were excessive.” Define what you mean by an “excessive” rate increase.

UPS/USPS-T36-11. Refer to your testimony on page 13, where you state: “drastic rate changes in these categories would be likely to hamper understanding of the extent to which these destination entry discounts have benefited parcel post mailers.” Define what you mean by a “drastic” rate change.

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: March 7, 2000  
Philadelphia, Pa.

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