BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE
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 ROBINSON
(UPS/USPS-T34-16 through 17)
(March 8, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby

serves the following interrogatories directed to United States Postal Service witness

Robinson: UPS/USPS-T34-16 through 17.

Respectfully submitted,

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

UPS/USPS-T34-16. Refer to your testimony on pages 17-18, where you propose to "maintain the current relative rate structure" so that "the Postal Service will be able to fully evaluate the operational feasibility of alternate network configurations without being constrained by having fully incorporated the unique features of the current contract into rates." Why is it appropriate to maintain the current relative rate structure when significant changes to costs are likely?

UPS/USPS-T34-17. Refer to your testimony on page 19, where you propose a pickup fee of $10.25, based upon an estimated weighted average cost for pick-ups of $10.01. Does the proposed $10.25 fee exceed the estimated pickup cost for: (i) Express Mail? (ii) Priority Mail? (iii) Standard (B) Parcels?

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.

William J. Pinamont
Attorney for United Parcel Service

Dated: March 8, 2000
Philadelphia, Pa.

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