

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE
OFFICE OF THE GENERAL COUNSEL

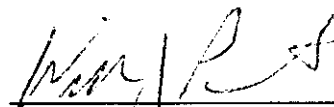
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES FROM
UNITED PARCEL SERVICE TO UNITED STATES
POSTAL SERVICE WITNESS PLUNKETT
(UPS/USPS-T36-12)
(March 9, 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-T36-12.

Respectfully submitted,



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Of Counsel.

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

UPS/USPS-T36-12. Refer to the sheet entitled "PQ3-data" in spreadsheet "PPattd-j.xls" provided in USPS-LR-I-62. At lines 41-61 of this sheet is a section of data with a notation "Data from QT993XX.xlw" which gives Revenue, Pieces, and Weight for each of the following:

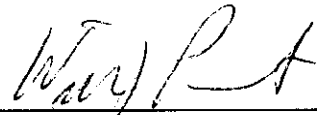
STD B INTER-BMC MACH PARCEL POST
AGEN STD B INTER-BMC MACH PARCEL POST
CONGR FRANK STD B INTER-BMC MACH PARCEL POST
STD B INTRA-BMC PARCEL POST
STD B PARCEL POST COMBINATION ENCLOSURE REVENUE
STD B BCODE INTER-BMC MACH PARCEL POST
STD B BCODE INTRA-BMC PARCEL POST
STD B ORIGIN BMC PRES INTER-BMC MACH PARCEL POST
STD B ORIGIN BMC PRES BCODE INTER-BMC MACH PARCEL POST
STD B ORIGIN BMC PRES INTER-BMC NONMACH PARCEL POST
STD B BMC PRES INTER-BMC MACH PARCEL POST
STD B BMC PRES BCODE INTER-BMC MACH PARCEL POST
STD B INTER-BMC NONMACH PARCEL POST
STD B DESTINATION BMC PARCEL POST
AGEN STD B DESTINATION BMC PARCEL POST
CONGR FRANK STD B DESTINATION BMC PARCEL POST
STD B BCODE DESTINATION BMC PARCEL POST
STD B DESTINATION SCF PARCEL POST
STD B DESTINATION DELIV UNIT PARCEL POST
STD B BMC PRES INTER-BMC NONMACH PARCEL POST
STANDARD (B) INTRA-BMC ALASKA BYPASS PARCEL POST

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

- (a) Confirm that this data is from Postal Quarter 3 of 1999. If not confirmed, explain.
- (b) Provide this same set of data for Postal Quarter 1 of 1999.
- (c) Provide this same set of data for Postal Quarter 2 of 1999.
- (d) Provide this same set of data for Postal Quarter 4 of 1999.

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 9, 2000
Philadelphia, Pa.

60211