

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED
MAR 15 10 58 AM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

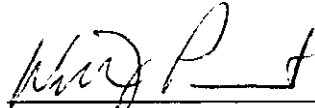
POSTAL RATE AND FEE CHANGES, 2000 :

DOCKET NO. R2000-1

INTERROGATORIES FROM
UNITED PARCEL SERVICE TO UNITED STATES
POSTAL SERVICE WITNESS EGGLESTON
(UPS/USPS-T26-16 through 19)
(March 15, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Eggleston: UPS/USPS-T26-16 through 19.

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 EGGLESTON

UPS/USPS-T26-16. Refer to page 22 of USPS-T-26.

(a) Provide all reasons why Alaska air non-preferential costs should be assigned to the inter-BMC rate category.

(b) Provide all reasons why Alaska air non-preferential costs should be assigned to the intra-BMC rate category.

(c) Provide all reasons why Alaska air non-preferential costs should not be assigned to the DBMC rate category.

(d) Provide your understanding as to the allocation of Alaska air non-preferential costs to the inter-BMC, intra-BMC, and DBMC rate categories under the methodology used by the pricing witness in the last rate case.

(e) Explain the rationale for any change in the general allocation of Alaska air non-preferential costs to the inter-BMC, intra-BMC, and DBMC rate categories under your proposed treatment as opposed to that of the pricing witness in the last rate case.

UPS/USPS-T26-17. Refer to the "Summary" worksheet in file "LR103PP0798.xls" contained in USPS-LR-I-103. Explain in detail why the IOCS operation 07 (platform acceptance) volume variable costs for certain cost groups (e.g., \$148,000 for "spbs Oth") were not included in line 4 of Attachment F of USPS-T-26 when these costs are Outgoing costs as summarized in the "Basic" worksheet in file "LR103PP0798.xls".

UPS/USPS-T26-18. Refer to the "Summary" worksheet in file "LR103PPBF98.xls" contained in USPS-LR-I-103. For each MODS and non-MODS

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

cost pools in which there are volume variable costs for Outgoing Parcel Post (e.g., \$926,000 for "fsm" at line 3 in column 11), describe what type of costs are captured in the cost pool and why there would be Outgoing Parcel Post costs in that cost pool.

UPS/USPS-T26-19. Refer to your response to UPS/USPS-T26-7.

(a) Provide all available documentation regarding the requirements for the mailer of DDU parcels to unload the truck and place the parcels into the delivery unit's choice of container.

(b) Provide all available documentation with respect to the delivery unit's choice of container, including, but not limited to:

- (i) the type of container,
- (ii) whether the type of container varies by the size of parcel or parcels, and
- (iii) where in the delivery unit the container is located.

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 15, 2000
Philadelphia, Pa.

60213