

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

INTERROGATORY OF UNITED PARCEL SERVICE
DIRECTED TO UNITED STATES POSTAL SERVICE
WITNESS DEGEN
(UPS/USPS-T16-7)
(March 15, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby
directs the following interrogatory to United States Postal Service witness Degen:

UPS/USPS-T16-7.

Respectfully submitted,



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

UPS/USPS-T16-7. Refer to page 3-3 of Library Reference USPS-LR-I-1.

(a) Which MODS 1&2 cost pools include the costs for platform operations (e.g., loading and unloading trucks, crossdocking pallets and other containers of mail) at Associate Offices, Stations and Branches?

(b) Which MODS 1&2 cost pools include the costs for cancellation and mail preparation at Associate Offices, Stations and Branches?

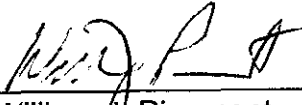
(c) Which MODS 1&2 cost pools include the costs of a typical outgoing parcel entered at the window of an Associate Office, Station or Branch incurred prior to its leaving the Associate Office, Station or Branch.

(d) Which MODS 1&2 cost pools include the costs of a typical outgoing parcel entered at the platform of an Associate Office, Station or Branch incurred prior to its leaving the Associate Office, Station or Branch.

(e) Which MODS 1&2 cost pools include the costs of a typical incoming parcel incurred after the parcel reaches the platform of an Associate Office, Station or Branch.

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 D. Pinamont
Attorney for United Parcel Service

Dated: March 15, 2000
Philadelphia, Pa.