

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2000 :
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DOCKET NO. R2000-1

INTERROGATORIES FROM
UNITED PARCEL SERVICE TO UNITED STATES
POSTAL SERVICE WITNESS BOZZO
(UPS/USPS-T15-18 through 20)
(March 17, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Bozzo: UPS/USPS-T15-18 through 20.

Respectfully submitted,



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

UPS/USPS-T15-18. In the estimation dataset contained in library reference USPS-LR-I-107, the following sites have no piece handlings in any of the MODS operations at the start of the 24 periods sampled, but come in with positive piece handlings elsewhere in the sample:

Sites 27, 39, 48, 128, 160, 168, 177, 188, 189, 192, 196, 266, 267.

For each of these sites, explain whether (a) this is a new site which came into existence during the time period sampled, (b) this site did not report data into the MODS system, or (c) there is some other explanation for the zero piece handlings across all MODS groups at the start of the sample. If your answer is (c), provide the explanation or explanations.

UPS/USPS-T15-19. In the estimation dataset contained in library reference USPS-LR-I-107, the following sites have no piece handlings in any of the MODS operations at the end of the 24 periods sampled:

Sites 44, 177, 320.

For each of these sites, explain whether (a) this site closed down its operations, (b) this site did not report data into the MODS system, or (c) there is some other explanation for the zero piece handlings across all MODS groups at the end of the sample. If your answer is (c), provide the explanation or explanations.

UPS/USPS-T15-20. In the estimation dataset contained in library reference USPS-LR-I-107, the following sites have intermittent periods of zero piece handlings across all MODS groups during the sample:

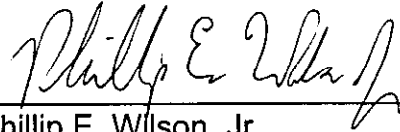
Sites 196, 231, 316.

INTERROGATORIES OF UNITED PARCEL SERVICE
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For each of these sites, explain whether (a) this site temporarily closed down its operations, (b) this site did not report data into the MODS system, or (c) there is some other explanation for the intermittent zero piece handlings across all MODS groups. If your answer is (c), provide the explanation or explanations.

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.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: March 17, 2000
Philadelphia, Pa.

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