

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

MAR 22 1 20 PM '00

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

INTERROGATORY FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE
WITNESS TOLLEY
(UPS/USPS-T6-12)
(March 22, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby
serves the following interrogatory directed to United States Postal Service witness

Tolley: UPS/USPS-T6-12.

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.

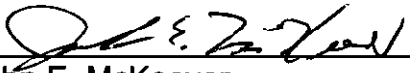
INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS TOLLEY

UPS/USPS-T6-12. Refer to Chart H on page 154 of your testimony. That chart shows total Parcel Post volume of approximately 291.6 million pieces, whereas the Postal Service's Cost and Revenue Analysis report for FY1997 shows total Parcel Post volume of approximately 236 million pieces.

- (a) Explain this discrepancy.
- (b) Are the volume figures in your Chart H restated in any way to take into account the Postal Service's use in FY1998 of information from postage statements in estimating RPW volumes, rather than relying solely on the DRPW system for estimating Parcel Post volumes?

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.



John E. McKeever
Attorney for United Parcel Service

Dated: March 22, 2000
Philadelphia, Pa.

60754