

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

INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS FROM UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS BRADLEY
(UPS/USPS-T22-6 through 9)
(March 23, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Bradley: UPS/USPS-T22-6 through 9.

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 BRADLEY

UPS/USPS-T22-6. Refer to page 34 of your testimony, where you state that it is “[your] understanding that the Eagle Network exists for the purpose of providing air transportation for Express Mail.” USPS-T22, at 34, lines 16-17. Explain the basis for your understanding.

UPS/USPS-T22-7. Refer to page 2 of the testimony of witness Pickett, USPS-T19, where he states that “premium costs of the Eagle and Western networks are treated as incremental to Express Mail.” USPS-T19, at 2, lines 2-3. Is it your understanding that the Western network exists for the purpose of providing air transportation for Express Mail? If so, provide the basis for your understanding.

UPS/USPS-T22-8. Refer to the testimony of witness Xie, USPS-T-1, page 24, Table 9. Confirm that, in BY98, Express Mail accounted for 9 percent (\$1,161,000/\$12,398,000) of non-premium Western Network costs.

UPS/USPS-T22-9. Refer to footnote 28 on page 38 of your testimony, where you state that “It is my understanding that the air network is sized for a minimum scale.” Refer also to the response of the Postal Service to Interrogatory UPS/USPS-T1-17, redirected from witness Xie, in which the Postal Service indicates that on August 29, 1999, the aircraft deployed on the Western network were upgraded from DC-9-30s and DC-9-15s to 727-200s.

(a) On page 38, footnote 28, of your testimony, are you referring to the scale of the Western Network prior to August 27, 1999, or to its current scale?

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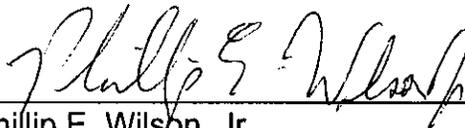
(b) If you were referring to the scale of the Western Network as it existed in BY98, is it your opinion that currently, following the upgrade to 727-200s, the Western Network is still at the minimum efficient scale needed for the transportation of Express Mail?

(c) Provide supporting data by mail class and subclass to show how rising mail volumes have affected the scale of the Western Network.

(d) Provide volume data by mail class for the Western Network from August 20, 1999, through AP4, PY2000.

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 23, 2000
Philadelphia, Pa.

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