

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 2000

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DOCKET NO. R2000-1

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INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS  
OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS HARAHUSH  
(UPS/USPS-T3-2)  
(March 23, 2000)

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatory and request for production of documents directed to United States Postal Service witness Harahush: UPS/USPS-T3-2.

Respectfully submitted,



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Of Counsel.


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UPS/USPS-T3-2. Confirm that the City Carrier System ("CCS") data for City Carrier Routes (CCR) can be used to estimate the number of parcels by class/subclass of mail. For example, the CCS data for CCR could be used to determine the number of Standard A parcels as opposed to Standard B parcels.

(a) If confirmed, provide a table using CCS data for CCR that shows the distribution of parcels by class and subclass for all stop types. Provide the files and programs that you use to perform this calculation. If the files have already been provided, cite the specific references and files to be used.

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.

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

Dated: March 23, 2000  
Philadelphia, Pa.

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