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POSTAL RATE AND FEE CHANGES, 2000

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INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS FROM UNITED PARCEL SERVICE  
DIRECTED TO THE UNITED STATES POSTAL SERVICE  
(UPS/USPS-37 through UPS/USPS-43)  
(May 3, 2000)

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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: UPS/USPS-37 through UPS/USPS-43.

Respectfully submitted,



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Of Counsel.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF  
UNITED PARCEL SERVICE DIRECTED TO UNITED STATES POSTAL SERVICE

UPS/USPS-37. Provide all quarterly revenue adjustment factors used in the RPW System to adjust the DRPW estimates for each quarter of FY1999. If you cannot provide this information, explain in detail why.

UPS/USPS-38. For each quarter in FY1999, provide (a) the quarterly BRPW estimates of revenue, pieces, and weight for each of the mail classes or subclasses for which BRPW was used to derive estimates of revenue, pieces, and weight, (unadjusted or true-up to trial balance), (b) the trial balance revenue balances for each unique account, and (c) the adjustment factors used for each unique trial balance account. If you cannot provide this information, explain in detail why.

UPS/USPS-39. Provide separately:

(a) FY1999 BRPW revenue, piece, and weight estimates for each of (i) Inter-BMC, (ii) Intra-BMC, and (iii) DBMC Parcel Post.

(b) FY1999 DRPW revenue, piece, and weight estimates for each of (i) Inter-BMC, (ii) Intra-BMC and (iii) DBMC Parcel Post.

(c) FY1999 OMAS and Alaska Bypass Parcel Post estimates.

(d) FY1999 Combined Enclosure revenue, piece, and weight estimates for Parcel Post.

UPS/USPS-40. Explain in detail any changes to any part of the RPW process, system, or subsystems for FY1999 versus what was done in FY1998. If any changes were made, explain in detail for each change why it was made.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF  
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UPS/USPS-41. When was a unique trial balance account for BRPW Parcel Post first set up?

(a) Was it used to develop the FY1999 BRPW estimates for Parcel Post?

(b) If not, when was it made part of the RPW process?

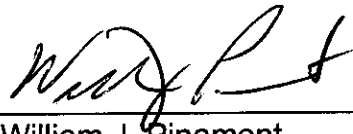
(c) If it has not yet been implemented into the RPW process, explain when it is expected to be implemented.

UPS/USPS-42. If any adjustment to the BRPW estimates of revenue, pieces, and weight for Parcel Post was made in FY1999 to reflect Parcel Post revenue, pieces, and weight sent at non-automated offices (similar to the 1.00920754 blow-up factor used for FY1998), provide the factor that was used to make that adjustment in FY1999 and all supporting documentation.

UPS/USPS-43. In the case of each class or subclass of mail for which the BRPW system was used to derive estimates of revenue, pieces, and weight in FY1999, provide all of the factors used for Postal Quarters 1 and 4 in FY1999 to convert the BRPW estimates from a PFY basis to a GFY basis.

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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William J. Pinamont  
Attorney for United Parcel Service

Dated: May 3, 2000.  
Philadelphia, Pa.