

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

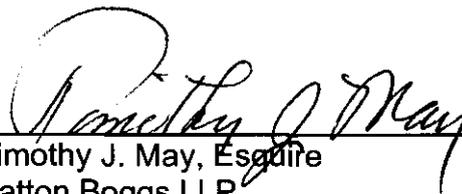
POSTAL RATE AND FEE CHANGES

DOCKET NO. R2000-1

FIRST INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED PARCEL SERVICE WITNESS LUCIANI (UPS-T-5-1-2)

The Parcel Shippers Association (PSA) requests United Parcel Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,



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Counsel for Parcel Shippers Association

Dated: June 12, 2000

**INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED PARCEL SERVICE WITNESS LUCIANI**

PSA/UPS-T-5-1

Please refer to your work paper, WP-3, the Excel Worksheet "3-1.1 Summary Page."

(a) Please confirm that the rates you are proposing for Parcel Post will increase Parcel Post revenue per piece by 31.1%. If not confirmed, please provide the correct figure.

(b) Please confirm that your proposed rate increase for Parcel Post would result in the loss of 81,200,000 parcels, or a 25.7% decrease in volume. If not confirmed, please provide the correct figure.

(c) Please confirm that the rates you are proposing for Priority Mail will increase Priority Mail revenue per piece by 40.3%. If not confirmed, please provide the correct figure.

(d) Please confirm that your proposed rate increase for Priority Mail would result in the loss of 286,700,000 pieces, or a 21.1% decrease in volume. If not confirmed, please provide the correct figure.

PSA/UPS-T-5-2

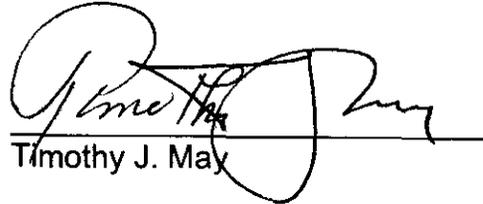
(a) Please confirm that Table 6 in your testimony, on page 18, sums UPS' proposed increases in Base Year attributable costs for Parcel Post, and shows an increase from the Postal Service's \$889.9 million to \$1,041.1 million, or an increase of \$160.2 million.

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(b) Please provide the piggyback cost impact of each attributable cost change UPS is proposing, and explain any difference between the sum of these individual impacts and cost changes and the \$160.2 million Base Year impact in Table 6.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.



Timothy J. May

Dated: June 12, 2000