

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

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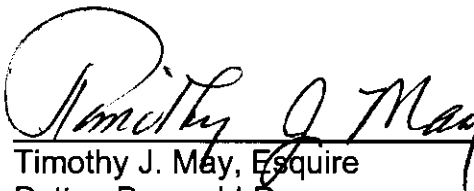
**POSTAL RATE AND FEE CHANGES**

**DOCKET NO. R2000-1**

**FIRST INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION  
TO UNITED PARCEL SERVICE WITNESS SELICK (UPS-T-4-1)**

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,

  
\_\_\_\_\_  
Timothy J. May, Esquire  
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Counsel for Parcel Shippers Association

Dated: June 12, 2000

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

**PSA/UPS-T-4-1.**

Please refer to your testimony at page 18, lines 22-23, where you state: "As shown in Exhibit UPS-T-4C (filed under seal), even these highly aggregated records contain nonsensical results."

(a) Please identify the source for the aggregated data records included in Exhibit UPS-T-4C.

(b) Please state the total number of aggregated data records included in the source identified in (a).

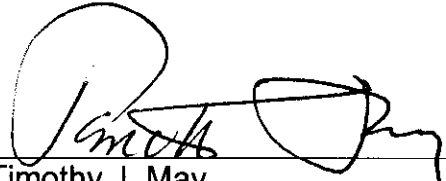
(c) Please state the total number of aggregated data records in the source identified in (a) for which you have identified results that you believe to be "nonsensical." For each of these records, please further provide precise identifying information to allow them to be uniquely located in the source identified in (a) and a brief description of the reason you believe them to be "nonsensical."

(d) Please explain the meaning of the phrase "Does Not Include 5% Cushion" that forms part of the titles on pages 8, 9, and 10 of Exhibit UPS-T-4C.

(e) Please explain whether the aggregated data records on pages 8, 9, and 10 of Exhibit UPS-T-4C appear in the Postal Service data after the "Revenue Tolerance Check" described on page 9 of your testimony.

## 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