

POSTAL RATE AND FEE CHANGES, 2000

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

INTERROGATORY FROM UNITED PARCEL SERVICE TO  
MAGAZINE PUBLISHERS OF AMERICA, INC., ET AL.  
WITNESS HAY, MPA-T-4  
(UPS/MPA-T4-1)  
(June 19, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatory directed to Magazine Publishers of America, inc., et al., witness Hay: UPS/MPA-T4-1.

Respectfully submitted,



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INTERROGATORY OF UNITED PARCEL SERVICE TO  
MAGAZINE PUBLISHERS OF AMERICA, INC., ET AL., WITNESS HAY

UPS/MPA-T4-1. At page 13 of your testimony you discuss the difference between an engineering study and cost estimates. You also refer to the A.T. Kearney Data Quality Study to support your conclusions about the ES study data. MPA-T-4, pages 18-19.

(a) Did you consider the following passage in the Data Quality Study (Summary Report, page 82) when developing your conclusions about engineering data?

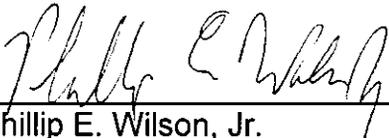
Other Postal Administrations (Canada, Australia, New Zealand, Netherlands, Sweden) and Courier Companies (Federal Express and United Parcel Service) use route measurement systems to design and attribute their delivery costs. These organizations design their delivery routes based on engineering time studies that allow the organizations to design routes to fit an eight-hour workday. .

These organizations not only design and manage their delivery personnel using this system but they also assign costs to delivery activities based on this system.

(b) If so, describe how your conclusion regarding the use of engineering data for costing purposes is consistent with these statements?

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: June 19, 2000  
Philadelphia, Pa.

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