

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE
INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
UNITED PARCEL SERVICE WITNESS LUCIANI
(USPS/UPS-T5-37)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatory and request for production of documents to United Parcel Service witness Luciani: USPS/UPS-T5-37.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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June 21, 2000

USPS/UPS-T5-37. Please refer to your response to USPS/UPS-T5-1(d).

- (a) Please provide all evidence that you have to support your claim that 7.11 percent of DBMC volume is not entered at the destination SCF in the test year.
- (b) Please provide all evidence that you have to support your claim that all of the DBMC volume entered at the destination SCF in the base year, will become DSCF and DDU volume in the test year. Please address the fact that both of the new rate categories have much more stringent requirements than DBMC.
- (c) Please confirm that it is possible a mailer, who dropped DBMC volume at the destination DSCF in FY 1998, might not have enough volume at the 5-digit presort lever in order to meet the DSCF requirements, but still may drop DBMC mail at the destination DSCF for convenience.
- (d) Please confirm that a mailer who drops DBMC volume at the destination DSCF in the test year, may not have enough volume to justify transporting parcels to each delivery unit in order to receive the DDU rate.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", is written above a solid horizontal line.

Scott L. Reiter

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