

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

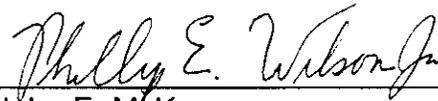
DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL SERVICE DIRECTED
TO THE UNITED STATES POSTAL SERVICE
(UPS/USPS-56 through UPS/USPS-62)
(July 31, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby
serves the following interrogatories directed to the United States Postal Service:

UPS/USPS-56 through UPS/USPS-62.

Respectfully submitted,



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Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE
DIRECTED TO THE UNITED STATES POSTAL SERVICE

UPS/USPS-56. Refer to the response to interrogatory UPS/USPS-37. Provide all of the inputs required to calculate the adjustment factors provided in that response.

UPS/USPS-57. Refer to the response to interrogatory UPS/USPS-38(a). That interrogatory requested, "For each quarter in FY 1999, 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 [f]or true-up to trial balance)." The Postal Service's response to this part was, "The BRPW estimates of RPW totals for the four postal quarters of FY 1999 are provided by subclass in USPS-LR-I-333/R2000-1."

(a) Are the Parcel Post estimates provided in Library Reference USPS-LR-I-333 final GFY estimates (adjusted for true-up to the trial balance, non-automated offices, and PFY/GFY)? If not, explain in detail what they represent.

(b) Provide the quarterly BRPW estimates of revenue, pieces, and weight for each rate category of Parcel Post for FY1999, both adjusted and unadjusted for true-up to the trial balance, non-automated offices, and PFY/GFY.

UPS/USPS-58. Provide quarterly FY1999 estimates (adjusted and unadjusted for true-up to the trial balance, non-automated offices, and PFY/GFY) of revenue, pieces and weight for Parcel Post assuming only the DRPW system was used to estimate all Parcel Post mailings.

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UPS/USPS-59. Confirm that in the first two postal quarters of FY1999, no unique trial balance account was available to adjust BRPW Parcel Post estimates. If you cannot confirm, explain in detail why not.

UPS/USPS-60. Confirm that for PQ1 and PQ2 of FY1999, BRPW Parcel Post estimates were not adjusted to a unique trial balance account. If you cannot confirm, explain in detail why not.

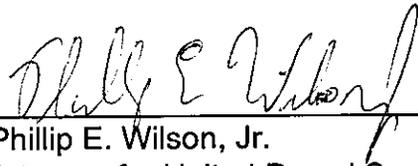
UPS/USPS-61. Confirm that for PQ1 and PQ2 of FY1999, the only factors used to adjust BRPW Parcel Post estimates were the 1.00920754219 factor, which was used to adjust for non-automated offices, and the PFY/GFY adjustment factors. If you cannot confirm, explain in detail why not.

UPS/USPS-62. (a) Refer to the response to interrogatory UPS/USPS-T-41. How many of the offices designated as non-automated offices in the PQ2, FY1997 census were automated by the beginning of FY1999, PQ1?

(b) Provide an estimate of the BRPW Parcel Post GFY total revenue, pieces, and weight for FY1999, PQ1 and PQ2, related to the offices that were non-automated in PQ2, FY1997, but were later automated by the beginning of PQ1, FY1999.

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.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: July 31, 2000.
Philadelphia, Pa.

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