

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
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POSTAL RATE AND FEE CHANGES, 2000  
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: DOCKET NO. R2000-1  
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RESPONSES OF UNITED PARCEL SERVICE WITNESS  
STEPHEN E. SELICK TO QUESTIONS POSED AT  
HEARINGS BY UNITED STATES POSTAL SERVICE  
(August 28, 2000)  
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During oral cross-examination of UPS witness Stephen E. Sellick on his supplemental testimony (UPS-ST-1), counsel for the Postal Service asked Mr. Sellick several questions. Mr. Sellick's responses are attached.

Respectfully submitted,



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Of Counsel.

RESPONSE OF UNITED PARCEL SERVICE WITNESS STEPHEN E. SELICK  
TO QUESTION OF UNITED STATES POSTAL SERVICE AT HEARINGS

Tr. 37/17002, lines 21-23. If you disregard the three Library Reference 401 records with the largest weight differences, what does the aggregate difference then amount to?

**RESPONSE:** 3,810,815 pounds.

RESPONSE OF UNITED PARCEL SERVICE WITNESS STEPHEN E. SELICK  
TO QUESTION OF UNITED STATES POSTAL SERVICE AT HEARINGS

Tr. 37/17003, lines 8-10. What if you disregard the 113 records with the largest weight discrepancies, then what does the aggregate difference become?

**RESPONSE:** 8,523 pounds.

RESPONSE OF UNITED PARCEL SERVICE WITNESS STEPHEN E. SELICK  
TO QUESTION OF UNITED STATES POSTAL SERVICE AT HEARINGS

Tr. 37/17008, lines 16-17. How many total records did you find problematic in any respect?

**RESPONSE:**

	NUMBER OF POSTAGE STATEMENTS	NUMBER OF VIP BLOCKS
Revenue Differs	2,367	4,802
Pieces Differ	2,367	4,802
Weight Differs	127,596	219,328

RESPONSE OF UNITED PARCEL SERVICE WITNESS STEPHEN E. SELICK  
TO QUESTION OF UNITED STATES POSTAL SERVICE AT HEARINGS

Tr. 37/17012, lines 7-8. How many total records, postage statement-level records appear in Library Reference 401?

**RESPONSE:** 212,717.

RESPONSE OF UNITED PARCEL SERVICE WITNESS STEPHEN E. SELICK  
TO QUESTION OF UNITED STATES POSTAL SERVICE AT HEARINGS

Tr. 37/17012, lines 15-16. How many total VIP-level records are there?

**RESPONSE:** 657,156.

**DECLARATION**

I, Stephen E. Sellick, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Stephen E. Sellick

Dated: August 28, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

  
\_\_\_\_\_  
John E. McKeever

Dated: August 28, 2000  
Philadelphia, PA

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