

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
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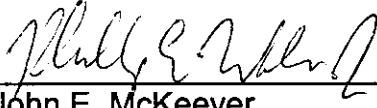
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS MEEHAN
(UPS/USPS-T11-1 through 2)
(October 10, 2001)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Meehan (UPS/USPS-T11-1 through 2).

Respectfully submitted,



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INTERROGATORIES OF UNITED PARCEL SERVICE
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UPS/USPS-T11-1. For Base Year 2000, identify the total cost incurred in connection with the PMPC network and provide the source for all numbers in the Base year workpapers.

(a) Identify the non-transportation costs of operating the Priority Mail Processing Centers.

(b) Identify the costs associated with transportation in the PMPC network.

(c) Identify the non-transportation costs associated with the PMPC network.

(d) Identify those PMPC network costs that are not included in (a) or (b).

UPS/USPS-T11-2. Refer to USPS-LR-J-49, spreadsheet "Prg_01_s.XLS", page "HQ & FSU," line item "HQ & Field Service Units."

(a) What is the total cost of the Postal Service's Sales function in BY2000? Provide separate figures for Headquarters, field operations, and contract services, including references where these costs are found in the Cost Segments and Components report.

(b) Describe what activities are included in Sales function costs.

(c) Show the distribution of these costs to individual Postal Service products.

(d) Describe the methodology that is used to distribute these costs.

(e) Are customer service costs included in the total cost of the Sales function? If not:

(i) Provide the total customer service costs for the Postal Service in BY2000, with separate figures for Headquarters, field operations, and contract services

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and including references where these costs are found in the Cost Segments and Components report.

- (ii) Describe what activities are included in customer service costs.
- (iii) Show the distribution of these costs to individual Postal Service products.
- (iv) Describe the methodology that is used to distribute these costs.

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: October 10, 2001
Philadelphia, PA

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