

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 2001

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DOCKET NO. R2001-1

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INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS BRADLEY  
(UPS/USPS-T16-1 through 4)  
(November 1, 2001)

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service Witness Bradley: (UPS/USPS-T16-1 through 4).

Respectfully submitted,



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INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS BRADLEY

UPS/USPS-T16-1. Refer to page 5 of your testimony, USPS-T-16, where you state that the Commission's rejection of the Engineered Standards study in Docket No. R2000-1 "likely reflects the unique circumstances in that case . . . ." Explain in detail what the "unique circumstances in that case" were.

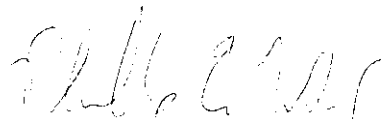
UPS/USPS-T16-2. Has the Postal Service used the results of the Engineered Standards study for internal management of its carrier operations? If so, explain how. If not, why not?

UPS/USPS-T16-3. Does the Postal Service continue to use the results of the Engineered Standards study for internal management of its carrier operations? If so, explain how. If not, why not?

UPS/USPS-T16-4. Does the Postal Service currently conduct, or is the Postal Service planning to conduct, any other studies of its carrier operations? If so, describe the studies in detail. If none are planned, explain why not.

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: November 1, 2001  
Philadelphia, PA