

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE
(UPS/USPS-12 through 14)
(November 5, 2001)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatories directed to the United States Postal Service: UPS/USPS-12 through 14.

Respectfully submitted,

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UPS/USPS-12 Refer to the Postal Service's response to UPS Interrogatories redirected from Witness Tayman UPS/USPS-T6-7 (erroneously identified by the Postal Service as UPS/USPS-T6-6).

(a) Provide the proportion of volume that is not Priority Mail and that is processed at those Priority Mail Processing Centers that are now operated by the Postal Service.

(b) Describe how the costs for the ten Priority Mail Processing Centers are attributed to classes and subclasses in the Test Year.

UPS/USPS-13. Refer to the Postal Service's response to Interrogatory OCA/USPS-60(c) and (d).

(a) Are the legal costs of defending the Postal Service's Priority Mail advertisements caused by the provision of Priority Mail? If not, what product or group of products caused these costs to be incurred?

(b) If the legal costs of defendant the Postal Service's Priority Mail advertisements were caused by the provision of Priority Mail, explain the discrepancy between this and the statement that there is "no appropriate accounting or economic basis for attributing these costs to Priority Mail."

(c) Has the Postal Service studied the costs of defending the Postal Service's Priority Mail advertisements? If so, has the Postal Service made the determination based on such studies not to attribute them to Priority Mail? If the Postal Service has not studied these costs, explain what is meant by "the judgement of the Postal Service."

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UPS/USPS-14. Refer to the Postal Service's response to Interrogatory OCA/USPS-22 and to library reference USPS-LR-J-72. Provide the advertising copy and each radio and television script used to provide "image" advertising for both Fiscal Year 2000 and Fiscal Year 2001.

CERTIFICATE OF SERVICE

I hereby certify that on this date I have caused to be served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.

Phillip E. Wilson, Jr.

Dated: November 5, 2001
Philadelphia, PA
90387