BEFORE THE POSTAL RATE COMMISSION

POSTAL RATE AND FEE CHANGES, 2001 :

DOCKET NO. R2001-1

INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS MEEHAN (UPS/USPS-T11-5 through 8) (November 8, 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-T11-5 through 8.

Respectfully submitted,

John E. McKeever Phillip E. Wilson, Jr. Laura A. Biancke Attorneys for United Parcel Service

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

UPS/USPS-T11-5. Provide the total cost in BY2000 of the Postal Service's call centers.

UPS/USPS-T11-6. Identify the cost segment and component in which the Postal Service's call center costs are accrued.

UPS/USPS-T11-7. Does the Postal Service measure or record any information on the activities that Postal Service call center personnel perform? If so, describe the nature of the information that is collected and how it is used.

UPS/USPS-T-11-8. Has the Postal Service studied the costs of operating the call centers? Provide the distribution of these costs to Postal Service products and describe the methodology that is used to distribute call center costs to Postal Service products.

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: November 8, 2001

Philadelphia, PA

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