

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**INTERROGATORY OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS SHAW
(UPS/USPS-T1-1)
(November 8, 2001)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatory directed to United States Postal Service witness Shaw: UPS/USPS-T1-1.

Respectfully submitted,

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INTERROGATORY OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS SHAW

UPS/USPS-T1-1. Refer to page 7 of your testimony where you discuss the replacement of the old City Carrier In-Office Cost Attributable (“LIOCATT”) system reports with an In-Office Cost System (“IOCS”)-based Carrier Mixed Mail (“CARMM”) report for the purposes of distributing city carrier in-office labor costs associated with mixed mail to classes and subclasses of mail.

- (a) Why did the Postal Service decide to replace the LIOCATT report with the CARMM report?
- (b) Does the CARMM report produce the same calculations using the same methodologies as the LIOCATT report but in a different programming language? Explain in full.
- (c) Are the calculations and methodologies of the CARMM report different from the LIOCATT report? If so, explain in full.
- (d) Confirm that the CARMM report uses essentially the same mixed mail cost distribution methodology that was used for Cost Segment 3.1, Mail Processing Labor Costs, prior to R97-1. Explain any differences in full. If confirmed, explain why the Postal Service did not implement the improved mixed mail cost distribution methodology now used for Cost Segment 3.1 for Cost Segment 6.1.
- (e) Has the Postal Service considered or is the Postal Service considering implementing the improved mixed mail cost distribution methodology now used for Cost Segment 3.1 for Cost Segment 6.1? If not, why not?

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 8, 2001
Philadelphia, PA

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