

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COM. COM. DIV.
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO
UNITED STATES POSTAL SERVICE WITNESS PAFFORD
(UPS/USPS-T1-1 through UPS/USPS-T1-7)**

(July 23, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Pafford (UPS/USPS-T1-1 through UPS/USPS-T1-7).

Respectfully submitted,



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Of Counsel.

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD**

UPS/USPS-T1-1. Please refer to lines 19 through 22 of your testimony.

Provide (a) the number of automated bulk mail entry offices from which information supplied by mailers on mailing statements was gathered and (b) the number of offices where the bulk mail entry function has not been automated from which information was gathered.

UPS/USPS-T1-2. (a) Please refer to lines 3-5 on page 4 of your testimony, where you state, “[M]ost postage revenue accounts are general accounts which are not identified with specific mail categories.” Has the Postal Service considered implementing a data collection system under which postage revenue, at least for major classes and subclasses of mail, would be identified with specific mail categories? If not, why not? If so, please provide all studies and reports relating to the Postal Service’s consideration of this matter.

(b) Please refer to lines 5 and 6 on page 4 of your testimony. Has the Postal Service considered adopting a revenue accounting system which would contain volume information? If not, why not? If so, please provide all studies and reports relating to the Postal Service’s consideration of this matter.

(c) Please provide (i) an estimate of the costs of implementing a data system under which postage revenue accounts would be identified with specific mail categories and (ii) an estimate of the costs of implementing a revenue accounting system containing volume information.

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD**

UPS/USPS-T1-3. Please refer to lines 2-4 on page 7 of your testimony. Describe all "miscellaneous data" to which you refer, and in the case of all such data, describe how it is used to produce estimates of revenue and volume as referred to by you.

UPS/USPS-T1-4. Please refer to Table 1 on page 8 of your testimony. Why did the Postal Service not calculate a coefficient of variation for Express Mail? Please compute and provide the coefficient of variation for Express Mail.

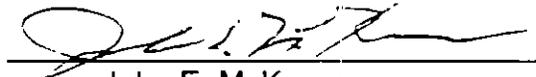
UPS/USPS-T1-5. Please refer to Table 1 on page 10 of your testimony. What is meant by the entry for "Out. MO taken into rev" under the column "Service Category"?

UPS/USPS-T1-6. Please refer to Table 2 on page 11 of your testimony. Why did the Postal Service not compute a coefficient of variation for Express Mail? Please compute and provide the coefficient of variation for Express Mail.

UPS/USPS-T1-7. Please refer to Table 3 on page 14 of your testimony. Why did the Postal Service not compute a coefficient of variation for Express Mail? Please compute and provide the coefficient of variation for Express Mail.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.



John E. McKeever

Dated: July 23, 1997
Philadelphia, Pa.