

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED
JUL 24 10 32 AM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE
(UPS/USPS-T34-1)**

(July 24, 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 Taufique (UPS/USPS-T34-1).

Respectfully submitted,



John E. McKeever
Albert P. Parker
Stephanie Richman
Attorneys for United Parcel Service

Schnader Harrison Segal & Lewis LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
(215) 751-2200

and

1913 Eye Street, N.W., Suite 600
Washington, D.C. 20006-2106
(202) 463-2900

Of Counsel.

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

UPS/USPS-T34-1. On pages 4 to 6 of your testimony you discuss the reasoning behind the proposal to eliminate Standard A Mail Single Piece. Please explain in detail how it is possible for First Class, "an all-encompassing substitute that offers many features that Standard Mail lacks, such as free forwarding and return, air transportation, better service standards, and fewer content restrictions," to cost less than Standard A Single Piece.

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 24, 1997
Philadelphia, Pa.