

BEFORE THE
POSTAL RATE COMMISSION

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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 MODEN
(UPS/USPS-T4-1)**

(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 Moden (UPS/USPS-T4-1).

Respectfully submitted,



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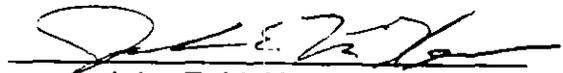
Of Counsel.

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

UPS/USPS-T4-1. On page 19, lines 6 to 8, of your testimony, you state that standard conversion factors are used to compute comparative productivities across BMCs. Please provide all such conversion factors, their source, and all information related to their calculation or determination.

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.