

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

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**THIRD SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS MAYES  
(UPS/USPS-T37-13)**

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(July 28, 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 Mayes (UPS/USPS-T37-13).

Respectfully submitted,



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Of Counsel.

**INTERROGATORY OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS MAYES**

**UPS/USPS-T37-13.** Please refer to lines 7 to 15 on page 23 of your testimony.

(a) Will packaging service be available only in the case of packages shipped as Parcel Post? If not, please list all classes and subclasses in which packaging service will be available and state separately for each such class and subclass the estimated volume of the packages in the class or subclass that will also make use of packaging service.

(b) Please refer especially to lines 11 to 12 on page 23. Do you expect the availability of packaging service for Priority Mail to cause "a larger portion of Parcel Post [to] convert to Priority Mail?" If so, state why and provide the estimated volume, and the associated revenue and cost of that volume, that you expect to migrate from Parcel Post to Priority Mail because of the availability of packaging service for Priority 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.

  
Stephanie Richman

Dated: July 28, 1997  
Philadelphia, Pa.