

BEFORE THE  
POSTAL RATE COMMISSION

RECEIVED

AUG 1 12 58 PM '97

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

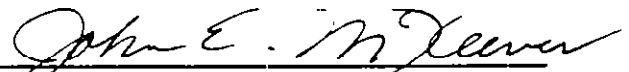
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

SECOND SET OF INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS FROM UNITED  
PARCEL SERVICE TO UNITED STATES POSTAL SERVICE  
(UPS/USPS-4 through UPS/USPS-13)

(August 1, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents on the United States Postal Service (UPS/USPS-4 through UPS/USPS-13).

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**

**UPS/USPS-4.** Please provide for each year from FY 1991 up to and including FY 1996 the amount of cost spent in advertising Priority Mail.

**UPS/USPS-5.** Please provide for FY 1997 and, separately, for FY 1998 the estimated amount of cost spent and to be spent in advertising Priority Mail.

**UPS/USPS-6.** Please provide for each year from FY 1991 up to and including FY 1996 the amount of cost spent in advertising Express Mail.

**UPS/USPS-7.** Please provide for FY 1997 and, separately, for FY 1998 the estimated amount of cost spent and to be spent in advertising Express Mail.

**UPS/USPS-8.** Please provide for each year from FY 1991 up to and including FY 1996 the amount of cost spent in advertising Parcel Post.

**UPS/USPS-9.** Please provide for FY 1997 and, separately, for FY 1998 the estimated amount of cost spent and to be spent in advertising Parcel Post.

**UPS/USPS-10.** Please provide for each year from FY 1991 up to and including FY 1996 the amount of cost spent in advertising parcel services generally.

**UPS/USPS-11.** Please provide for FY 1997 and, separately, for FY 1998 the estimated amount of cost spent and to be spent in advertising parcel services generally.

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

**UPS/USPS-12.** Please provide for each year from FY 1991 up to and including FY 1996 the amount of cost spent in advertising International Mail generally.

**UPS/USPS-13.** Please provide for FY 1997 and, separately, for FY 1998 the estimated amount of cost spent and to be spent in advertising International Mail generally.

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: August 1, 1997  
Philadelphia, Pa.