

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

AUG 4 8 54 AM '97

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

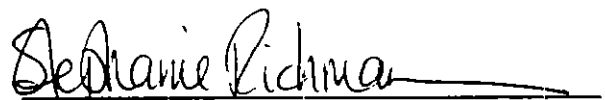
DOCKET NO. R97-1

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS PANZAR
(UPS/USPS-T11-1 through 2)**

(August 4, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatory and request for production of documents directed to United States Postal Service witness Panzar (UPS/USPS-T11-1 through 2).

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.

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

UPS/USPS-T11-1. Please confirm that the cost curve "C" is missing from Figure 1, on page 22 of your direct testimony. Please provide a Figure 1 that includes the cost curve "C."

UPS/USPS-T11-2. Please provide a reference for or explain the derivation of the equation on line 16 of page 26 of your direct testimony.

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: August 4, 1997
Philadelphia, Pa.