

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 TREWORY  
(UPS/USPS-T22-1 through 11)**

(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 Treworgy (UPS/USPS-T22-1 through 11).

Respectfully submitted,



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Of Counsel.

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

**UPS/USPS-T22-1.** Please confirm that the new hand held scanner will initially be used solely for delivery confirmation. If not confirmed, please explain.

**UPS/USPS-T22-2.** Please refer to pages 2-3 of your direct testimony, where you discuss the "delivery and collection management" and "service performance measurement" uses of the new hand held scanners.

(a) Please indicate what measures, if any, have been taken to initiate the use of the new handheld scanner program in these areas.

(b) Please provide all memoranda, reports, studies, timetables, or other documentation supporting the use and timetable for implementation of these uses of the scanners.

**UPS/USPS-T22-3.** Please refer to page 3, footnote 3, of your testimony and confirm that, currently, the new hand held scanners will be used only for Priority Mail and Standard (B) delivery confirmation. If not confirmed, please explain.

**UPS/USPS-T22-4.** (a) Please confirm that the specifics of how the scanners will be used for delivery confirmation (or other purposes) for Express Mail, inbound international mail, Certified Mail, Registered Mail, and insurance special services have yet to be determined. If not confirmed, please explain.

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

(b) Please provide all memoranda, reports, studies, timetables, or other documentation supporting the use and timetable for implementation of these anticipated uses of the scanners.

**UPS/USPS-T22-5.** Please verify that there are only 9 steps for Table 5 on page 9 of your direct testimony. If not confirmed, please explain.

**UPS/USPS-T22-6.** Please describe the type(s) of labels that will be used for delivery confirmation. Please include in your answer a discussion of whether or not either form 2 or form 3849 will used with the delivery confirmation service.

**UPS/USPS-T22-7.** Please provide a more detailed description of the capital and program costs listed in your Worksheet C-1. Include in your answer a description of the components of "Miscellaneous" under Program Costs, which accounts for 19 percent of those costs.

**UPS/USPS-T22-8.** Please confirm that the non-volume variable portion of the capital and program costs (72 percent of the total) are treated as institutional costs and not as specific-fixed costs. If not confirmed, please explain.

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

**UPS/USPS-T22-9.** Please refer to your Worksheet C-2.

(a) Please confirm that your proposed distribution key allocates 0.81% of costs to Priority Mail and 1.03% of costs to Fourth-class mail.

(b) Please confirm that Priority Mail and Fourth-class Mail are the only classes of mail for which there is a scheduled application of the scanner. If not confirmed, please explain.

(c) Please confirm that your proposed distribution key allocates 98.2% of the volume-variable capital and program costs to classes of mail for which the scanners currently have no specific scheduled application. If not confirmed, please explain.

**UPS/USPS-T22-10.** Please explain why you did not select a distribution key which would distribute costs only to those classes of mail (Priority and Standard (B)) which, at this time, are the only classes scheduled to make use of this service.

**UPS/USPS-T22-11.** Please explain why you did not elect to classify the non-volume variable portion of the scanner capital and program costs as specific-fixed to those classes of mail (Priority and Standard (B)) which, at this time, are the only classes scheduled to make use of this service.

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.