

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T4-1)

The United States Postal Service hereby provides the response of witness Moden to the following interrogatory of United Parcel Service: UPS/USPS-T4-1, filed on July 24, 1997.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
August 6, 1997

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

UPS/USPS-T4-1. On page I 9, 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.

Response:

A summary of pieces to parcels conversion factors is attached. These factors were implemented in 1985-1986 based on a time and motion study of BMC operations completed earlier. Documentation describing the study methodology is no longer available.

SUMMARY OF WEIGHTED FACTORS

AS OF : 18-Sep-87

MAIL TYPE	MIN/PC	WT. FACTOR
PARCEL	0.2858	1.00
SACK	0.5251	1.84
NMO	0.8886	3.11
IPP	0.1404	0.49
075	0.0680	0.24
045	0.0470	0.16
115	3.3972	11.89
PALLET	8.7110	30.48

DECLARATION

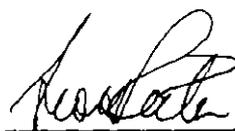
I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Ralph J Moden

Dated: August 5, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Scott L. Reiter

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