

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 BRADLEY
TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T13-24)

The United States Postal Service hereby provides responses of witness
Bradley to the following interrogatory of United Parcel Service:
UPS/USPS-T13-24, filed on August 6, 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



Susan M. Duchek

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August 20, 1997

Response of United States Postal Service Witness Bradley
to
Interrogatories of United Parcel Service

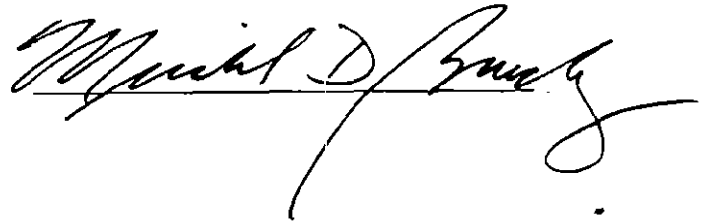
UPS/USPS-T13-24. Please confirm that purchased highway transportation contracts include costs associated with loading and unloading mail onto and from vehicles. Please explain your answer.

UPS/USPS-T13-24 Response:

Partially confirmed. The purchased highway transportation contracts specify that the contractor allow for sufficient time for loading and unloading. In many instances, the contractor will load and unload the vehicle. In these cases, the cost of loading and unloading are included in the contract cost. However, to the extent that trucks are loaded and unloaded by Postal Service mail handlers, the costs are not included in the contract.

DECLARATION

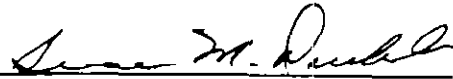
I, Michael D. Bradley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, reading "Michael D. Bradley". The signature is written in a cursive style and is positioned above a horizontal line.

Dated: August 20, 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.



Susan M. Duchek
Susan M. Duchek

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