

BEFORE THE
POSTAL RATE COMMISSION

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

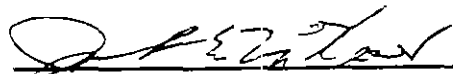
DOCKET NO. R97-1

FIFTH SET OF INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE
(UPS/USPS-18 through 21)

(August 22, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to the United States Postal Service (UPS/USPS-18 through 21).

Respectfully submitted,



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Of Counsel.

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TO THE UNITED STATES POSTAL SERVICE**

UPS/USPS-18. Please refer to the response to Interrogatory UPS/USPS-T14-4(a).

(a) In the MODS data system, is any information collected for different mail shapes? If so, specify all information collected on the basis of the different shapes of mail.

(b) In the PIRS data system, is any information collected for different mail shapes? If so, specify all information that is collected on the basis of the different shapes of mail.

UPS/USPS-19. Please refer to the response to Interrogatory UPS/USPS-T14-4(e), which states that MODS and PIRS data are reviewed at headquarters and that anomalous values are identified and reported to the individual facilities involved "for appropriate resolution." When anomalous values are identified, are those values ever changed for purposes of MODS data, or is the anomalous data edited or changed in any way after it is identified and reported to the individual facilities?

UPS/USPS-20. Please refer to the response to Interrogatory UPS/USPS-T14-10.

(a) Please identify the "additional locations" that reported MODS data during the base year.

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(b) Are the criteria used by district and area management along with operations support personnel at headquarters for purposes of deciding whether to designate additional locations for inclusion in MODS set forth in writing? If so, please produce all such criteria. If not, please indicate the nature of the factors considered in making the decision whether to designate additional locations for inclusion in MODS.

UPS/USPS-21. Please refer to the response to Interrogatory UPS/USPS-5.

(a) This response states in part that "total advertising cost change factors" (emphasis added) are used in the rollforward model to calculate estimated total advertising costs for FY 1997 and FY 1998. Are the cost change factors based on budgeted or estimated amounts for advertising expenditures for different types or classes of mail, or are they determined independently of any specific estimated or budgeted amounts? If they are based on or include budgeted or estimated amounts, please provide the budgeted or estimated amounts, separately for FY 1997 and for FY 1998, for (i) Priority Mail, (ii) Express Mail, (iii) Parcel Post, and (iv) International Mail.

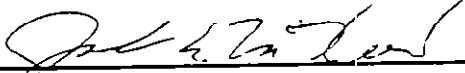
(b) The response states that in the Postal Service's rollforward model, "advertising costs are treated as 'Other' costs and not explicitly identified with any particular class of mail" (emphasis added). Please provide, separately for Priority Mail, Express Mail, Parcel Post, and International Mail, those advertising costs that are

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included in the "Other" costs in the Postal Service's rollforward model (i) for FY 1997
and (ii) for FY 1998.

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 22, 1997
Philadelphia, PA