

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED
AUG 27 12 26 PM '97

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**SIXTH SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE TO
TO THE UNITED STATES POSTAL SERVICE
(UPS/USPS-22 through UPS/USPS-26)**

(August 27, 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 United States Postal Service (UPS/USPS-22 through UPS/USPS-26).

Respectfully submitted,



John E. McKeever
Albert P. Parker, II
Stephanie Richman
Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103-7286
(215) 751-2200

and

1913 Eye Street, N.W., Suite 600
Washington, D.C. 20006-2106
(202) 463-2900

Of Counsel.

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE**

UPS/USPS-22. Please refer to the response to interrogatory UPS/USPS-T-15-5 (redirected from Patelunas). Please describe whether and how different classes and/or subclasses of mail are or might be affected differently by the use of postal packs, and describe how the Postal Service has measured the cost effects described.

UPS/USPS-23. Please indicate where in the filed testimony, workpapers, exhibits, and other supporting materials the costs of purchasing postal packs are reflected in test year costs, and identify the cost segment and component in which these costs are included. If postal pack costs are not specifically reflected and identified in the test year, please explain why.


UPS/USPS-24. Please indicate whether, and in what proportion, the trays and sacks in postal packs contain parcels or other shapes of mail.

UPS/USPS-25. Please indicate where in the filed testimony, workpapers, exhibits, and other supporting materials the costs of IMHS are reflected in test year costs, and identify the cost segment and component in which these costs are included. If IMHS costs and cost savings are not specifically reflected and identified in the test year, please explain why.

UPS/USPS-26. Please describe how IMHS costs and cost savings are (a) calculated, and (b) allocated to classes and subclasses of mail.

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.



Albert P. Parker, II

Dated: August 27, 1997
Philadelphia, PA