

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS CRUM  
(UPS/USPS-T28-19 through 21)**

(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 witness Crum (UPS/USPS-T28-19 through 21).

Respectfully submitted,



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Of Counsel.

**FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS CRUM**

**UPS/USPS-T28-19.** Please refer to page 2 of your testimony in MC97-2, and page 3 of your testimony in R97-1. Confirm that total DBMC cost savings were 35.1 cents in MC97-2, and 46.9 cents in R97-1, and explain why this number has changed.

**UPS/USPS-T28-20.** Please refer to page 4 of your testimony in MC97-2, and page 4 of your testimony in R97-1. Confirm that total OBMC savings were 49.8 cents in MC97-2, and 57.2 cents in R97-1, and explain why this number has changed.

**UPS/USPS-T28-21.** Please confirm that the reference to LR-H-146 in part "D" (Test Year/Base Year Adjustment) of your Exhibit C is correct. If not confirmed, please provide the accurate reference.

**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.

  
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Albert P. Parker, II

Dated: August 27, 1997  
Philadelphia, PA