

BEFORE THE  
POSTAL RATE COMMISSION

RECEIVED

AUG 29 3 10 PM '97

\_\_\_\_\_  
POSTAL RATE AND FEE CHANGES, 1997  
\_\_\_\_\_

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
DOCKET NO. R97-1

\_\_\_\_\_  
**FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS BRADLEY  
(UPS/USPS-T14-31 through 34)**  
\_\_\_\_\_

(August 29, 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 Bradley (UPS/USPS-T14-31 through 34).

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.

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

**UPS/USPS-T14-31.** Please refer to Table 7, at page 54 of your testimony, and confirm:

(a) Line 15, SPBS Priority, should read 0.2009 (T-14, WP-1, VVMPL.SPBS.P.LISTING, page 9), rather than 0.2001. If not confirmed, please explain in full.

(b) Line 17, SPBS Non-Priority, should read 4,659 (T-14, WP-1 VVML.SPBSNP.LISTING, page 9), rather than 4,569. If not confirmed, please explain in full.

**UPS/USPS-T14-32.** Please confirm that the Errata you filed concerning Table 10, at page 67 of your testimony, is intended to correct the Line 10 result from -0.0154 to -0.0138, rather than from -0.1054 to -0.1038 as indicated in the Errata. If not confirmed, please explain in full.

**UPS/USPS-T14-33.** Please refer to Table 8, at page 63 of your testimony, and confirm:

(a) Lines 29 and 30, Pouching, should read 14,691, and 168, respectively (T-14, WP-2, VVML.POUCH.LISTING, page 13) . If not confirmed, please explain in full.

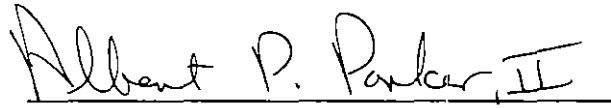
(b) Line 28, Platform, should read 0.9792 (T-14, WP-2, VVMPL.PLAT.LISTING, page 10). If not confirmed, please explain in full.

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

**UPS/USPS-T14-34.** Please refer to page 6, lines 14-15, and page 12, line 14 through page 13, line 4, of your testimony, where labor cost is alluded to as a possible left hand side variable and rejected in favor of hours recorded by MODS or PIRS. Please provide the data on labor cost by site ID number, accounting period, and activity, for all activities and for all years in the panel (1988-1996), as if it had been used as the dependent variable.

**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 29, 1997  
Philadelphia, PA