

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 PATELUNAS TO
INTERROGATORY UNITED PARCEL SERVICE
(UPS/USPS-T15-10)

The United States Postal Service hereby provides the responses of witness Patelunas to the following interrogatory of United Parcel Service: UPS/USPS-T15-10, filed on August 18, 1997.

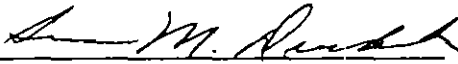
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
September 2, 1997

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

UPS/USPS-T15-10

Please explain what the data in Table C ("B Report") of Patelunas workpapers WP-D-WP-K represent.

UPS/USPS-T15-10 Response:

The Table C ("B Report") workpapers show the distributed PESSA costs. These costs are treated as "Other Costs" in the "A Report" and they are distributed to "Volume Variable Costs" in the "B Report." The sum of the "A Report" and the redistributed "B Report" costs produces the "C Report", the Cost Segments and Components report.

DECLARATION

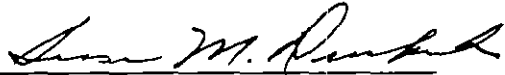
I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Richard Patelunas", written over a horizontal line.

Dated: 9/2/97

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

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