

**BEFORE THE  
POSTAL RATE COMMISSION**

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**POSTAL RATE AND FEE CHANGES, 2001**

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**DOCKET NO. R2001-1**

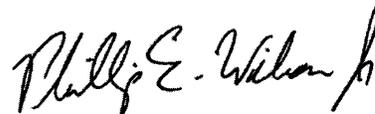
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**INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS TAYMAN  
(UPS/USPS-T6-10 through 12)  
(November 15, 2001)**

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Tayman (UPS/USPS-T6-10 through 12).

Respectfully submitted,



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John E. McKeever  
Phillip E. Wilson, Jr.  
Laura A. Biancke  
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP  
3400 Two Logan Square  
18th & Arch Streets  
Philadelphia, PA 19103-2762  
(215) 656-3300  
(215) 656-3301 (FAX)  
and  
1200 Nineteenth Street, NW  
Washington, DC 20036-2430  
(202) 861-3900

INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS TAYMAN

UPS/USPS-T6-10. Explain why there are no “PMPC In-House” cost adjustments for FY 2003.

UPS/USPS-T6-11. Refer to library reference USPS-LR-J-49, spreadsheet “Prg\_01\_s.XLS”, page “Summary.” Confirm that the net increase in costs from moving the Priority Mail Processing Center (“PMPC”) operations “in-house” is \$201,969,000 in FY 2001. If not confirmed, please provide the correct number.

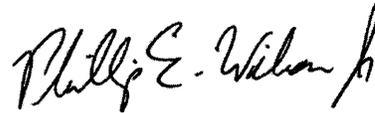
UPS/USPS-T6-12. Refer to library reference USPS-LR-J-49, spreadsheet “Prg\_01\_s.XLS”, page “Summary.”

(a) Confirm that the cost savings from moving the Priority Mail Processing Center (“PMPC”) operations “in-house” is \$137,470,000 in FY 2002. If not confirmed, provide the correct number.

(b) Explain in detail why the impact of moving the PMPC network in-house changed from a cost increase in FY 2001 to a cost savings in FY 2002.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



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Phillip E. Wilson, Jr.  
Attorney for United Parcel Service

Dated: November 15, 2001  
Philadelphia, PA

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