

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, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES
REDIRECTED FROM WITNESS BRADLEY
(UPS/USPS-T16-2-3)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-T16-2-3, filed on November 1, 2001. These interrogatories were redirected from witness Bradley to the Postal Service.

Each 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



Richard T. Cooper

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November 16, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS BRADLEY

UPS/USPS-T16-2. Has the Postal Service used the results of the Engineered Standards study for internal management of its carrier operations? If so, explain how. If not, why not?

Response:

The Postal Service has never used the results of the Engineered Standards study for internal management of city carriers. The study was rejected because it never addressed its primary purpose - how changes in carrier casing operations, while in-office, improve carrier street operations.

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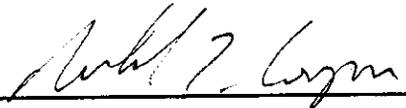
UPS/USPS-T16-3. Does the Postal Service continue to use the results of the Engineered Standards study for internal management of its carrier operations? If so explain how. If not, why not?

Response:

The Postal Service has never used the results of the Engineered Standards study for internal management of city carriers. The study was rejected because it never addressed its primary purpose - how changes in carrier casing operations, while in-office, improve carrier street operations.

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.



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