BEFORE THE POSTAL RATE COMMISSION

POSTAL RATE AND FEE CHANGES, 2001:

DOCKET NO. R2001-1

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INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS XIE (UPS/USPS-T2 1 THROUGH 3) (November 26, 2001)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatory directed to United States Postal Service witness

Xie: UPS/USPS-T2-1 through 3.

Respectfully submitted,

Pletti E. Willow &

John E. McKeever Phillip E. Wilson, Jr. Laura A. Biancke

Attorneys for United Parcel Service

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

(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 XIE

UPS/USPS-T2-1. Has the Postal Service calculated Confidence Intervals for all modes of contract highway transportation together? If so, provide those confidence intervals. If not, why not?

UPS/USPS-T2-2. Confirm that total cost for Parcel Post across all transportation modes for FY2000 is \$258,945,000. If not confirmed, provide the correct number.

UPS/USPS-T2-3. Confirm that adding the upper bound of the confidence intervals for each of the transportation modes yields \$299,409,000. If not confirmed, provide the correct number.

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.

Phillip E. Wilson, Jr.

Phillip E. Willow Ja

Attorney for United Parcel Service

Dated: November 26, 2001

Philadelphia, PA

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