POSTAL RATE AND FEE CHANGES, 2001   :   DOCKET NO. R2001-1

INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS XIE (UPS/USPS-T2-4 THROUGH 10) (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-T2-4 through 10.

Respectfully submitted,

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

UPS/USPS-T2-4. Are there interdependencies among costs for contract

highway transportation?

UPS/USPS-T2-5. 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-T2-6. Are there interdependencies among costs for any modes of

purchased transportation?

UPS/USPS-T2-7. Has the Postal Service calculated confidence intervals for the

sum of all modes of purchased transportation together? If so, provide those confidence
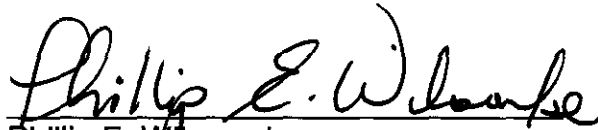
intervals. If not, why not?

UPS/USPS-T2-8. 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-T2-9. 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.

UPS/USPS-T2-10. Do you have any reason to believe that the covariance

between distribution key estimates for any of the possible combinations of purchased

transportation cost components is anything other than zero? If so, identify each

combination and explain why the covariance for that combination is not zero.

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.
Attorney for United Parcel Service

Dated: November 26, 2001
Philadelphia, PA

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