

**BEFORE THE  
POSTAL RATE COMMISSION**

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**POSTAL RATE AND FEE CHANGES, 2001**

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**DOCKET NO. R2001-1**

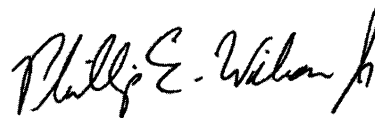
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**INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
(UPS/USPS-T39-68 through 80)  
(December 10, 2001)**

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatories directed to United States Postal Service witness Kingsley: UPS/USPS-T39-68 through 80.

Respectfully submitted,



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UPS/USPS-T39-68. In your response to interrogatory UPS/USPS-T-39-1, you state that Bulk Mail can arrive at a MODS facility as:

“Bulk Mail Entry Units at postal facilities (associate offices, plants, etc.)

Plant loaded onto postal transportation at mailer plants

Drop shipped by mailers into postal facilities”

(a) For each of the sources mentioned above, indicate whether any of the mail coming from that source would generate a Total Piece Handlings (TPH) count in any of the cost pools that are used in the econometric analysis by Dr. Bozzo?

(b) For each of the sources above for which you answered yes:

(i) List by shape and class all the types of mail that can generate TPH.

(ii) For each of the items listed in (i), indicate all the cost pools in which TPH will be recorded

(iii) For each of the items listed in (i), above, indicate in which MODS cost pool the corresponding First Handling Piece (FHP) would be recorded.

UPS/USPS-T39-69. (a) Describe the types of mail arriving at a MODS facility that are first processed in the Manual Parcel operation and hence are counted as Manual Parcel First Handling Pieces (“FHP”).

(b) How is the FHP measured for each type of mail that is first processed in the Manual Parcel operation and hence are counted as Manual Parcel FHP?

(c) Describe the types of mail that are processed in the Manual Parcel operation but do not get counted as FHP in that operation.

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(d) Indicate the MODS operation in which the mail that is processed in the Manual Parcel operation but does not get counted as FHP in that operation might get counted as FHP.

UPS/USPS-T39-70. Is Priority Mail ever processed in BCS cost pool? If yes:

(a) Explain the conditions under which Priority Mail will be processed in the BCS cost pool.

(b) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation.

UPS/USPS-T39-71. Is Priority Mail ever processed in BCS/DBCS cost pool? If yes:

(a) Explain the conditions under which Priority Mail will be processed in the BCS/DBCS cost pool.

(b) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

UPS/USPS-T39-72. Is Priority Mail ever processed in OCR cost pool? If yes:

(a) Explain the conditions under which Priority Mail will be processed in the OCR cost pool.

(b) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

UPS/USPS-T39-73. Is Priority Mail ever processed in FSM cost pool? If yes:

(a) Explain the conditions under which Priority Mail will be processed in the FSM cost pool.

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(b) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

UPS/USPS-T39-74. Is Priority Mail ever processed in FSM 1000 cost pool? If yes:

(a) Explain the conditions under which Priority Mail will be processed in the FSM 1000 cost pool.

(b) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

UPS/USPS-T39-75. Is Priority Mail ever processed in the "SPBS Other" cost pool? If yes:

(a) Explain the conditions under which Priority Mail will be processed in the SPBS Other cost pool.

(b) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

UPS/USPS-T39-76. Is Priority Mail ever processed in the Manual Letter cost pool? If yes:

(a) Explain the conditions under which Priority Mail will be processed in the Manual Letter cost pool.

(b) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

UPS/USPS-T39-77. Is Priority Mail ever processed in Manual Flats cost pool? If yes:

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(a) Explain the conditions under which Priority Mail will be processed in the Manual Flats cost pool.

(b) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

UPS/USPS-T39-78. Is Priority Mail ever processed in the "Manual Parcel" cost pool? If yes:

(a) Explain the conditions under which Priority Mail will be processed in the Manual Parcel cost pool.

(b) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

UPS/USPS-T39-79. Is Priority Mail the only type of mail that gets processed in SPBS Priority cost pool? If not:

(a) List all other types of mail that may get processed in the "SPBS Priority" cost pool.

(b) Explain the conditions under which mail other than Priority Mail will be processed in the SPBS Priority cost pool.

(c) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

UPS/USPS-T39-80. Is Priority Mail the only type of mail that gets processed in Manual Priority cost pool? If not:

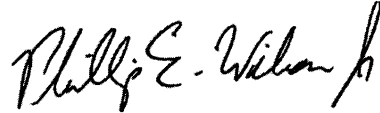
(a) List all other types of mail that may get processed in Manual Priority cost pool.

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- (b) Explain the conditions under which mail other than Priority Mail will be processed in the Manual Priority cost pool.
- (c) Is Priority Mail processed as a part of mixed mail stream or as a separated sort run dedicated to the priority operation?

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: December 10, 2001  
Philadelphia, PA

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