

**BEFORE THE
POSTAL RATE COMMISSION**

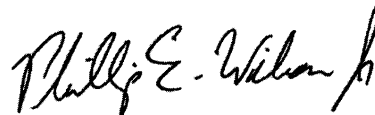
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS PATELUNAS
(UPS/USPS-T12-6 through 8)
(December 13, 2001)**

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 Patelunas: UPS/USPS-T12-6 through 8.

Respectfully submitted,



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

UPS/USPS-T12-6. Refer to your response to interrogatory UPS/USPS-T12-1.

What was the average ratio of full-time to casual employees in Postal Service mail processing facilities for FY2000 and FY2001? If the answer is anything other than 75% Full Time and 25% Casual, explain why you deviated from the system-wide average when you calculated the costs of operating the PMPC network in-house.

UPS/USPS-T12-7. Refer to your response to interrogatory UPS/USPS-T12-1.

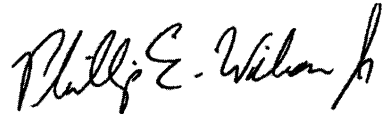
Confirm that your estimate of supervisor hours was based on the actual supervisor hours under the outsourced Priority Mail Processing Center contract. If not confirmed, explain.

UPS/USPS-T12-8. Refer to your response to interrogatory UPS/USPS-T12-1.

What is the average percent of supervisor hours to total work hours (clerk hours + supervisor hours) for all Postal Service facilities for FY2000 and FY2001. Explain any differences between the system-wide average percent of supervisor hours to total work hours and your estimate of supervisor hours based on the outsourced Priority Mail Processing Center contract.

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: December 13, 2001
Philadelphia, PA

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