

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2001

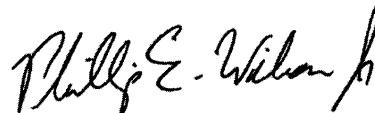
DOCKET NO. R2001-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO
THE UNITED STATES POSTAL SERVICE
(UPS/USPS-30 through 31)
(December 21, 2001)**

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

UPS/USPS-30 through 31.

Respectfully submitted,



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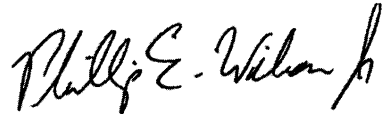
INTERROGATORIES OF UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE

UPS/USPS-30. Refer to page 22 of the testimony of Postal Service witness Hatfield (USPS-T-18), where he states that to estimate FedEx transportation costs he used volumes that "were provided by USPS Network Operations Management and are based on the current implementation plans . . . for the initial months of the agreement." Provide a comparison of the estimate of daytime volumes witness Hatfield used in his model to the actual daytime volume that were transported in Accounting Periods ("APs") 1, 2, and 3 of FY2002. For purposes of this question, provide the comparison as a percentage difference between the estimate and the actual results. Actual volumes do not need to be provided. Discuss any differences between the estimates and the actuals for APs 1, 2, and 3 of FY2002. If volume information is not available for APs 1, 2, and 3, provide comparisons based on all available data since the contract began.

UPS/USPS-31. Compare the estimated mix of mail by Air Class Tag (ACT) on the FedEx daytime network to the actual volume of First-Class and Priority Mail that was transported on the FedEx daytime network for Accounting Periods ("APs") 1, 2, and 3 of FY2002 to the estimates for FY2002 used by witness Hatfield (USPS-T-18). For purposes of this question, actual volumes of First-Class and Priority Mail do not need to be provided. Discuss any differences between the actual volumes for APs 1, 2, and 3 and the estimates used by witness Hatfield. If volume information is not available for APs 1, 2, and 3, provide comparisons based on all available data since the contract began.

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 21, 2001
Philadelphia, PA

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