

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 1997

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DOCKET NO. R97-1

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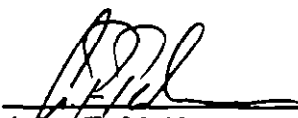
FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS BERNSTEIN  
(UPS/USPS-T31-1 through 2)

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(September 12, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Bernstein (UPS/USPS-T31-1 through 2).

Respectfully submitted,



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Of Counsel.

**INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS BERNSTEIN**

**UPS/USPS-T31-1.** Please refer to page 2 of your testimony, lines 2 through 11. Please confirm that the purpose described there was the primary objective for your analysis and the purpose described on lines 12 through 15 was a secondary objective. If not confirmed, please explain.

**UPS/USPS-T31-2.** Please refer to Table 11 on page 55 of your testimony.

(a) Please confirm that not all the prices listed there are Ramsey prices. If not confirmed, please explain.

(b) Please list all prices in Table 11 that are not Ramsey prices and the reasons why substitutes were used.

(c) Will substituting alternative prices for Ramsey prices for some subclasses of mail change the other prices shown in Table 11 so that they are different from what they would be if Table 11 only showed the rates resulting from the application of your Ramsey pricing formula?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

  
Albert P. Parker

Dated: September 12, 1997  
Philadelphia, Pa.