

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ADRA
(UPS/USPS-T38-1)**

(September 15, 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 Adra (UPS/USPS-T38-1).

Respectfully submitted,



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

UPS/USPS-T38-1. Please refer to page 8, lines 7-9, of your testimony, where you state that the weight-related non-transportation costs for Bound Printed Matter ("BPM") are 2 cents per pound for single piece nonlocal; 1.5 cents per pound for single-piece local; 1 cent per pound for bulk non-local; and 0.75 cents per pound for bulk local.

(a) Please explain your understanding of the historical rationale used to create different weight-related non-transportation adders for each of the four BPM categories.

(b) Do you agree with this historical rationale? Please explain your answer.

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.


Stephanie Richman

Dated: September 15, 1997
Philadelphia, Pa.