

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

**SEVENTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS BRADLEY
(UPS/USPS-T14-47)**

(September 15, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatory and request for production of documents directed to United States Postal Service witness Bradley (UPS/USPS-T14-47).

Respectfully submitted,



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Of Counsel.

**INTERROGATORY OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS BRADLEY**


UPS/USPS-T14-47. Please provide, separately by site ID and MODS activity as used in your testimony for each accounting period from Accounting Period 1 of Fiscal Year 1988 through Accounting Period 13 of fiscal year 1996 (or, if not available for that entire period, for the longest period of time available during that span of time) the following information:

- (a) Total piece volumes for all classes of mail combined.
- (b) Piece volumes for each of the following separately -- First Class Mail (excluding Priority Mail); Priority Mail; Express Mail; Second Class Mail; Third Class Mail; Parcel Post; all Fourth Class Mail excluding Parcel Post.
- (c) Overtime labor costs for clerks and mailhandlers (Cost Segment 3).
- (d) Clerk and mailhandler labor costs for casual employees.
- (e) Clerk and mailhandler labor costs for temporary employees.
- (f) Clerk and mailhandler labor costs for parttime employees.
- (g) Clerk and mailhandler labor costs for fulltime employees.
- (h) Any clerk and mailhandler labor costs not included in subparagraphs (c)-(h), with an indication of the nature of the costs.

If you do not have this data, please redirect this interrogatory to the Postal Service.

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 15, 1997
Philadelphia, PA