

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

SEP 15 11 17 AM '97

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ALEXANDROVICH
(UPS/USPS-T5-3 through 11)**

(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 Alexandrovich (UPS/USPS-T5-3 through 11).

Respectfully submitted,



John E. McKeever
Albert P. Parker, II
Stephanie Richman
Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103-7286
(215) 751-2200

and

1913 Eye Street, N.W., Suite 600
Washington, D.C. 20006-2106
(202) 463-2900

Of Counsel.

**INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ALEXANDROVICH**

UPS/USPS-T5-3. On pages 15-16 of Workpaper A-1, the Mail Processing (Components 35 & 546) and Window Services (Component 40) cost distributions do not match with the source documents: Worksheet 3.1.1 and 3.2.1 of Workpaper B-3. Please indicate which are the correct cost distributions.

UPS/USPS-T5-4. On pages 19-20 of Workpaper A-1, the Other (Component 41) cost distributions do not match with the source document: Worksheet 3.0.4 of Workpaper B-3. Please indicate which are the correct cost distributions.

UPS/USPS-T5-5. On page 20 of Workpaper A-1, Training Mail Proc Parcels (Component 469) total cost is listed as 407. However, on Worksheet 3.0.4 of Workpaper B-3 it is listed as 405. Please indicate which is the correct value.

UPS/USPS-T5-6. On page 38.1 of Workpaper A-2, you indicate that Data Collection (Component 421) variability is calculated to be variable with C/S 3 Mail Processing (Component 35). However, on page 38, Data Collection appears to be 79.18% volume variable, whereas on page 36 Mail Processing is only 76.26% volume variable. Please confirm that Data Collection variability, like that of Quality Control (Component 423), is actually calculated to be variable with the sum of C/S 3 Mail Processing and C/S 6 City Carriers in Office. If not confirmed, please explain why there is a difference in volume variability percentage between Data Collection and Mail Processing.

**INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ALEXANDROVICH**

UPS/USPS-T5-7. On page 20.1 of Workpaper A-2 you indicate that the distribution key for C/S 2 Time and Attendance Supervision (Component 009) is Component 525. Please provide the breakdown of Component 525 used for this distribution, and indicate by name and number which components comprise Component 525.

UPS/USPS-T5-8. On page 28.1 of Workpaper A-2 you indicate that the distribution key for C/S 2 Higher Level Supervisor (Component 030) is Component 294. Please provide the breakdown of Component 294 used for this distribution, and indicate by name and number which components comprise Component 294.

UPS/USPS-T5-9. On page 38.1 of Workpaper A-2 you indicate that the distribution key for C/S 3 General Office and Clerical (Component 422) is Component 294. Please provide the breakdown of Component 294 used for this distribution, and indicate by name and number which components comprise Component 294.

UPS/USPS-T5-10. On page 40.1 of Workpaper A-2 you indicate that the distribution key for C/S 3 Training Other (Component 470) is Component 473. Please provide the breakdown of Component 473 used for this distribution, and indicate by name and number which components comprise Component 473.

UPS/USPS-T5-11. In Workpaper B, the hard copy of Worksheet 4.1.1 does not correspond with the electronic version provided in LR-201. In the electronic

**INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ALEXANDROVICH**

version column 6 contains all zeros, resulting in a different Total Variable Cost by Class and Subclass. Furthermore, the footnotes and some of the column headers are different in the electronic version. Similar discrepancies appear in various other worksheets from Workpaper B. Please explain these discrepancies and provide updated electronic and/or hard copy versions of Workpaper B as appropriate.

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