

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

**FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS DANIEL
(UPS/USPS-T29-19 through 22)**

(September 17, 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 Daniel (UPS/USPS-T29-19 through 22).

Respectfully submitted,



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

UPS/USPS-T29-19. Please refer to Exhibit USPS-29E, page 6 of 6.

(a) Please explain all reasons why the proportional adjustment should apply specifically to the parcel sorting machine key operation versus the parcel sorting machine scan operation.

(b) Please explain what work practices would yield non-modeled costs and explain how these work practices would impact the differential in costs between the parcel sorting machine key operation versus the parcel sorting machine scan operation.

UPS/USPS-T29-20. Please refer to Appendix V of your testimony.

(a) Please provide the sources for Column 2 for the following operations:

- Move IHC
- Move OTRs
- Move Pallet
- Move OWC

(b) Please provide the sources for Column 1 for the following operations:

- Sweep Runouts OTR
- Sack and Tie

UPS/USPS-T29-21. Please describe the sack sorter and sack shakeout operations.

UPS/USPS-T29-22. Please explain if a DSCF or DDU could become capacity constrained due to a large increase in dropshipping.

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 17, 1997
Philadelphia, PA