

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

THIRTEENTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS MAYES
(UPS/USPS-T37-73 through 74)

(September 16, 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 Mayes (UPS/USPS-T37-73 through 74).

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.

**THIRTEENTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS MAYES**

UPS/USPS-T37-73. Please refer to your response to UPS/USPS-T37-41

and the sections cited therein of Handbook PO-502, Container Methods.

- (a) Confirm that the date of this manual is September 1992.
- (b) Confirm that Postal Service policy regarding loans of pallets, OTRs, and other containers, including return of such containers to private mailers, has been modified since 1992 in connection with the Integrated Mail Handling System and other initiatives.
- (c) Please identify and describe all such changes in policies toward provision of containers to private mailers, including internal policies and guidelines making such containers available to private mailers in connection with work sharing programs.
- (d) Please provide estimates of the Test Year and Base Year cost of mail transport equipment (MTE) loaned to private mailers, and include details on the inventory of such MTE by type, its cost, and estimates of depreciation and maintenance costs associated with this equipment.
- (e) Please explain how the costs of MTE loaned to DBMC mailers as identified in your answer to (d) above, are accounted for in your analysis of DBMC costs and proposed rates.

UPS/USPS-T37-74. Please refer to your workpapers, WP I.A., at page 1 of 23. Please describe the category "Intra-BMC Non-Alaska Bypass," and explain how this mail is different from "Intra-BMC Alaska Bypass" mail in terms of processing, transportation, etc.

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, II

Dated: September 16, 1997
Philadelphia, PA