

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
DOCKET NO. R97-1

**FOLLOW-UP INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS NIETO  
(UPS/USPS-T2-50)**

(September 25, 1997)

Pursuant to the Commission's Special Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Nieto (UPS/USPS-T2-50).

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.

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TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

**UPS/USPS-T2-50.** Please refer to your response to FGFSA/USPS-T2-

41.

- (A) Please explain how you estimated average height of loaded mail as 65" for Intra-BMC and 54" for Inter-BMC.
- (B) Please provide the same estimates for average height of loaded mail for Intra-SCF, Inter-SCF, Intra-BMC, and Inter-BMC for each postal quarter in FY96.
- (C) Are two pallets containing mail ever stacked one on top of another? If so, how often does this occur?
- (D) If two pallets (three feet high each) were stacked one on top of another, what would TRACS record as the pallet height?
- (E) Please explain how you estimate that wheeled containers are approximately 72" tall.

**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 25, 1997  
Philadelphia, PA