

DOCKET SECTION

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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25 SEP 1997

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997

Docket No. R97-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T14-44(a) REDIRECTED FROM WITNESS BRADLEY)

The United States Postal Service hereby provides the response of witness Moden to the following interrogatory of United Parcel Service: UPS/USPS-T14-44(a), filed on September 11, 1997, and redirected from witness Bradley.

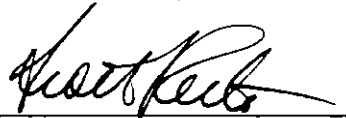
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
(202) 268-2999; Fax: -5402
Washington, D.C. 20260-1137
September 25, 1997

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF THE UPS
REDIRECTED FROM WITNESS BRADLEY**

UPS/USPS-T14-44.

- a. Please discuss the use of overtime wages to accommodate peak volume periods in MODS, non-MODS, and PIRS facilities versus the use of part-time or casual workers.

Response:

- a. Planning to use overtime is cost-effective in relatively few high volume periods such as Christmas. However, mail volumes are not entirely predictable and some employees with essential skills may be unexpectedly absent from work, so overtime is commonly incurred even when not planned. For additional details, see my response to DMA/USPS-T4-18d.

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 9/24/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
September 25, 1997