

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

SEP 29 5 47 PM '97

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PATELUNAS TO
INTERROGATORIES OF UNITED PARCEL SERVICE REDIRECTED FROM
WITNESS ALEXANDROVICH
(UPS/USPS-T5-6-10)

The United States Postal Service hereby provides responses of witness Patelunas to the following interrogatories of United Parcel Service: UPS/USPS-T5-6-10, filed on September 15, 1997 and redirected from witness Alexandrovich.

Each 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


Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
September 29, 1997

Answer of United States Postal Service Witness Patelunas
to the Interrogatories of
United Parcel Service
(Redirected from Witness Alexandrovich, USPS-T5)

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.

UPS/USPS-T5-6 Response:

Question 6 is confirmed.

Answer of United States Postal Service Witness Patelunas
to the Interrogatories of
United Parcel Service
(Redirected from Witness Alexandrovich, USPS-T5)

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 the distribution, and indicate by name and number which components comprise Component 525.

UPS/USPS-T5-7 Response:

The components (by number) that comprise Component 525 can be found on pages 59-60 of USPS Library Reference H-4. The names associated with each of the components (by number) that comprise Component 525 can be found on pages 221-250 of USPS Library Reference H-4.

Answer of United States Postal Service Witness Patelunas
to the Interrogatories of
United Parcel Service
(Redirected from Witness Alexandrovich, USPS-T5)

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 the distribution, and indicate by name and number which components comprise Component 294.

UPS/USPS-T5-8 Response:

The components (by number) that comprise Component 294 can be found on pages 28-29 of USPS Library Reference H-4. The names associated with each of the components (by number) that comprise Component 525 can be found on pages 221-250 of USPS Library Reference H-4.

Answer of United States Postal Service Witness Patelunas
to the Interrogatories of
United Parcel Service
(Redirected from Witness Alexandrovich, USPS-T5)

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 the distribution, and indicate by name and number which components comprise Component 294.

UPS/USPS-T5-9 Response:

The components (by number) that comprise Component 294 can be found on pages 28-29 of USPS Library Reference H-4. The names associated with each of the components (by number) that comprise Component 525 can be found on pages 221-250 of USPS Library Reference H-4.

Answer of United States Postal Service Witness Patelunas
to the Interrogatories of
United Parcel Service
(Redirected from Witness Alexandrovich, USPS-T5)

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 the distribution, and indicate by name and number which components comprise Component 473.

UPS/USPS-T5-10 Response:

The components (by number) that comprise Component 473 can be found on pages 26-27 of USPS Library Reference H-4. The names associated with each of the components (by number) that comprise Component 525 can be found on pages 221-250 of USPS Library Reference H-4.

DECLARATION

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Richard Patelunas", is written over a horizontal line.

Dated: 9/29/97

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
September 29, 1997