

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRADLEY
(USPS-T-14) TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T14-47)

The United States Postal Service hereby provides the response of witness
Bradley (USPS-T-14) to the following interrogatory of United Parcel Service:
UPS/USPS-T14-47, filed on September 15, 1997.

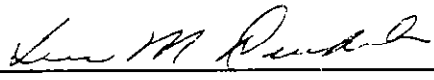
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

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

Response of United States Postal Service Witness Bradley
to
Interrogatories of UPS

UPS/USPS-T14-47. Please provide, separately by site ID and MODS activity as use in your testimony for each accounting period from Accounting Period 1 of Fiscal Year 1988 through Accounting Period 13 of fiscal year 1996 (or, if not available for that entire period, for the longest period of time available during that span of time) the following information:

- (a) Total piece volumes for all classes of mail combined.
- (b) Piece volumes for each of the following separately -- First Class Mail (excluding Priority Mail); Priority Mail; Express Mail; Second Class Mail; Third Class Mail; Parcel Post; all Fourth Class Mail excluding Parcel Post.
- (c) Overtime labor costs for clerks and mailhandlers (Cost Segment 3).
- (d) Clerk and mailhandler labor costs for casual employees.
- (e) Clerk and mailhandler labor costs for temporary employees.
- (f) Clerk and mailhandler labor costs for parttime employees.
- (g) Clerk and mailhandler labor costs for fulltime employees.
- (h) Any clerk and mailhandler labor costs not included in subparagraphs (c)-(h), with an indication of the nature of the costs.

If you do not have this data, please redirect this interrogatory to the Postal Service.

UPS/USPS-T14-47 Response:

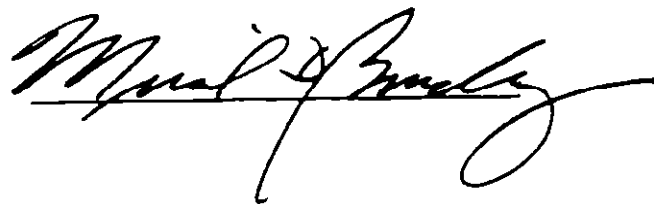
- a. The total piece volumes, as measured by total piece handlings for all classes combined in a MODS activity, at an individual site, are provided in Library Reference H-148. I have no other measures of piece volumes and, in response to my inquiries, the Postal Service informs me that no other such piece volume data exist.
- b. I have no piece volume data by class of mail and, in response to my inquiries, the Postal Service informs me that the requested class-specific piece volume data do not exist.

**Response of United States Postal Service Witness Bradley
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- c.-h. The MODS system records hours not dollar costs. Consequently, my MODS data set does not have the requested data. Moreover, in response to my inquiries, the Postal Service informs me that the data you request do not exist.

DECLARATION


I, Michael D. Bradley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, reading "Michael D. Bradley", written over a horizontal line.

Dated: Sept. 29, 1997

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

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