

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 TO INTERROGATORIES OF
UNITED PARCEL SERVICE REDIRECTED FROM WITNESS TAYMAN
(UPS/USPS-T9-7-10)

The United States Postal Service hereby provides responses to the following interrogatories of United Parcel Service: UPS/USPS-T9-7, filed on September 15, 1997 and UPS/USPS-T9-8-10, filed on September 17, 1997. All were redirected from witness Tayman.

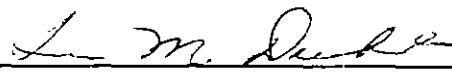
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

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September 29, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS TAYMAN

UPS/USPS-T9-7.

(a) Please confirm that Attachment 1 is a radio script for an advertising spot for Parcel Post that ran on November 27, 1996. If not confirmed, please explain why you are unable to confirm.

(b) Please confirm that Attachments A and B are print advertisements promoting Parcel Post that appeared in one or more publications at least once during fiscal year 1996. If not confirmed, please explain why you are not able to do so, and what Attachments A and B are.

(c) If either (a) or (b) is confirmed, please explain why Attachment I to the response to interrogatory UPS/USPS-4 (dated August 15, 1997) indicates that no costs were incurred by the Postal Service in fiscal year 1996 to advertise Parcel Post.

RESPONSE:

UPS/USPS-T9-7 a.-c. The Postal Service is unable to confirm. The Postal Service does not track individual advertising spots by date or class of mail. These examples are of the type that would have been used in the holiday advertising and 'Smart Solutions' programs which related to more than one class of mail. The Postal Service's advertising agencies do not have information about specific spots and dates readily available.

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UPS/USPS-T9-8. Please confirm that in Fiscal Year 1996, the Postal Service spent at least \$3 million to advertise Parcel Post. If not confirmed, please provide the correct number.

RESPONSE: The Postal Service is unable to confirm. See the response to UPS/USPS-T9-7.

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UPS/USPS-T9-9.

(a) Please refer to Attachment 1 to interrogatory UPS/USPS-T9-7(a). On how many occasions (in total for all radio stations) in FY 1996 did the advertising spot which is the subject of that attachment appear, and what was the total cost for all such occasions put together?

(b) Please refer to Attachments A and B to interrogatory UPS/USPS-T9-7(b). In what publications and on what dates did each of the advertisements which are the subject of those attachments appear during FY 1996, and what was the total cost of all such advertising?

RESPONSE: See the response to UPS/USPS-T9-7.

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UPS/USPS-T9-10.

- (a) Please confirm that the Postal Service spent approximately \$368,000.00 on Parcel Post advertising in magazines.
- (b) Please confirm that the Postal Service spent approximately \$1,950,000.00 in television advertising (both network and spot television advertising) on Parcel Post.
- (c) Please confirm that the Postal Service spent approximately \$800,000.00 in advertising Parcel Post on network radio.

RESPONSE: See the response to UPS/USPS-T9-7.

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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