

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 TREWORY TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T22-12)

The United States Postal Service hereby provides the response of witness Treworgy to the following interrogatory of United Parcel Service: UPS/USPS-T22-12, filed on September 17, 1997.

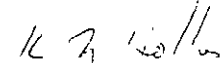
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
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(202) 268-3083; Fax -5402
September 30, 1997

U.S. POSTAL SERVICE WITNESS DAVID E. TREWORGY
RESPONSE TO INTERROGATORIES OF UNITED PARCEL SERVICE

Page 1 of 1

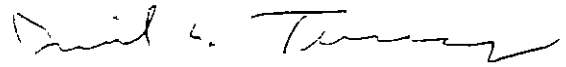
UPS/USPS-T22-12. Please refer to pages 2 through 4 of your direct testimony, where you discuss the purposes that the new scanners and the associated data system will serve. Have any estimates been prepared regarding the percent of (i) time, (ii) uses, (iii) benefit, or (iv) any other measure, that would accrue to each of three identified purposes? If yes, please provide any such estimates. If no, can you estimate the percent of (i) time, (ii) uses, (iii) benefit, or (iv) any other measure, that would accrue to each of three identified purposes?

RESPONSE:

No estimates have been prepared regarding the percent of (i) time, (ii) uses, (iii) benefit, or (iv) any other measure that would accrue to each of the three identified purposes that the new scanners and the associated data system will serve. No estimates can be made at this time because specific procedures have not been finalized.

DECLARATION

I, David E. Treworgy, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

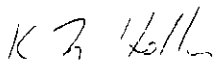


DAVID E. TREWORGY

Dated: 9/30/97

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.



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
September 30, 1997