

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 WADE  
(UPS/USPS-T20-4-8)

The United States Postal Service hereby provides responses to the following interrogatories of United Parcel Service: UPS/USPS-T20-4-8, filed on September 17, 1997, and redirected from witness Wade.

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

  
Anne B. Reynolds

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October 1, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF UNITED PARCEL SERVICE

**UPS/USPS-T20-4.** For the Base Year, what was the total of cubic foot miles (CFM) that moved via Vehicle Service Drivers (VSD) for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

**Response to UPS/USPS-T20-4.**

This information is not available by class of mail.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF UNITED PARCEL SERVICE

**UPS/USPS-T20-5.** For the Base Year, what was the total of cubic foot miles (CFM) that moved via Highway Contract Routes (HCR) for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

**Response to UPS/USPS-T20-5.**

This information is not available. Please refer to the response to FGFS/USPS-T13-11.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF UNITED PARCEL SERVICE

**UPS/USPS-T20-6.** For the Base Year, on segments where both VSD and HCR are available, what was the total of CFM that moved by VSD for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

**Response to UPS/USPS-T20-6.**

This information is not available. Please refer to the above response to UPS/USPS-T20-4.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF UNITED PARCEL SERVICE

**UPS/USPS-T20-7.** For the Base Year, on segments where both VSD and HCR are available, what was the total of CFM that moved by HCR for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

**Response to UPS/USPS-T20-7.**

This information is not available. Please refer to the above response to UPS/USPS-T20-5.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF UNITED PARCEL SERVICE

**UPS/USPS-T20-8.** For the Base Year, on segments where both VSD and HCR are available, what percentage of HCR segments are available under:

- (a) intra-SCF contracts;
- (b) inter-SCF contracts;
- (c) intra-BMC contracts;
- (d) inter-BMC contracts;
- (e) all other contracts (please specify).

**Response to UPS/USPS-T20-8.**

Not applicable. Please refer to the response to UPS/USPS-T20-13.

## 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.

  
Anne B. Reynolds

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