

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS CRUM  
(UPS/USPS-T28-41)

(October 6, 1997)

Pursuant to the Commission's Special Rules of Practice, United Parcel Service hereby serves the following interrogatory and request for production of documents directed to United States Postal Service witness Crum (UPS/USPS-T28-41).

Respectfully submitted,



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Of Counsel.


**FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS CRUM**

**UPS/USPS-T28-41.** In your response to UPS/USPS-T28-24, you state that "it would not have been possible to make the adjustments as such," referring to adjustments to FY 1996 Processing Costs for the costs of postage due, mail preparation, platform acceptance, and central mail markup as in Tables 1, 2, and 3 in LR-PCR-39 (Docket No. MC97-2).

- (a) If it were possible to calculate the costs associated with postage due, would you make the referred to adjustment? If your answer is other than yes, please explain in full why you would not perform such an adjustment and why it would be inappropriate to do so.
- (b) If it were possible to calculate the costs associated with mail preparation, would you make the referred to adjustment? If your answer is other than yes, please explain in full why you would not perform such an adjustment and why it would be inappropriate to do so.
- (c) If it were possible to calculate the costs associated with platform acceptance, would you make the referred to adjustment? If your answer is other than yes, please explain in full why you would not perform such an adjustment and why it would be inappropriate to do so.
- (d) If it were possible to calculate the costs associated with central mail markup, would you make the referred to adjustment? If your answer is other than yes, please explain in full why you would not perform such an adjustment and why it would be inappropriate to do so.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

  
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Albert P. Parker, II

Dated: October 6, 1997  
Philadelphia, PA