

# 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

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
UNITED PARCEL SERVICE WITNESS HENDERSON  
(USPS/UPS-T-3-1-3)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to United Parcel Service witness Henderson: USPS/UPS-T-3-1-3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Richard T. Cooper

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January 27, 1998

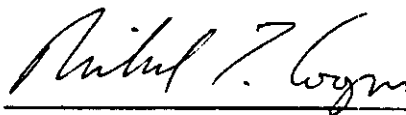
USPS/UPS-T3-1. Please refer to your testimony at page 10. Please confirm that if the price of a postal product or service exceeds its average incremental cost, that product or service will make a "contribution" to joint and common ("institutional") costs. If you do not confirm, please explain fully.

USPS/UPS-T3-2. Please refer to Opinion and Recommended Decision, Docket No. R94-1, paragraph 4010. Please explain how, if at all, employing markups over average incremental cost would determine the " 'assignment' of the remainder [non-attributable cost] based upon non-cost factors."

USPS/UPS-T3-3. Please refer to your testimony at page 12. Does your discussion of "the appropriate basis for postal pricing markups" assume that the long-run incremental cost of a postal product or service is greater than the short-run incremental cost of that product or service? Please explain fully.

## 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.

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", is written above a horizontal line.

Richard T. Cooper

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