

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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U.S. DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

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-3-4-5)

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-3-4-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Richard T. Cooper

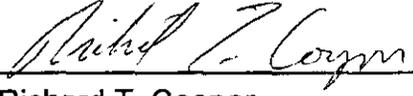
475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
January 28, 1998

USPS/UPS-T3-4. Based on your experience with market-based pricing requests before FERC, please identify and discuss fully the non-cost factors regulators should consider when reviewing or recommending new rates, particularly when the regulated firm is exposed to direct competition by an unregulated firm. Include in your discussion your opinion regarding how often these non-cost factors should be re-examined and reconsidered.

USPS/UPS-T3-5. Please provide a complete list of all books, scholarly publications, studies, or articles which you have authored.

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.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
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