

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION

RECEIVED

FEB 6 2 16 PM '98

---

POSTAL RATE AND FEE CHANGES, 1997

---

DOCKET NO. R97-1

---

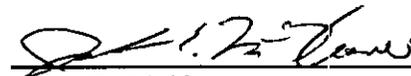
**ANSWERS OF UNITED PARCEL SERVICE WITNESS  
RALPH L. LUCIANI TO INTERROGATORIES OF  
UNITED STATES POSTAL SERVICE  
(USPS/UPS-T4-19 through 21)**

---

(February 6, 1998)

Pursuant to the Commission's Rules of Practice, United Parcel Service ("UPS") hereby serves and files the responses of UPS witness Ralph L. Luciani to interrogatories USPS/UPS-T4-19 through 21 of the United States Postal Service.

Respectfully submitted,



---

John E. McKeever  
Albert P. Parker, II  
Stephanie Richman  
Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP  
1600 Market Street, Suite 3600  
Philadelphia, Pennsylvania 19103-7286  
(215) 751-2000

and

1225 Eye Street, N.W., Suite 600  
Washington, D.C. 20005-3914  
(202) 463-2900

Of Counsel.

**ANSWER OF UNITED PARCEL SERVICE  
WITNESS LUCIANI TO INTERROGATORY OF  
THE UNITED STATES POSTAL SERVICE**

**USPS/UPS-T4-19.** On page 28 of your testimony, you present testimony and data regarding inbound and outbound postal highway movements. Consider the following truck routing: BMC to SCF1 to SCF2 to BMC.

- (a) Which of these legs do you regard as inbound?
- (b) Which of these legs do you regard as outbound?

**Response to USPS/UPS-T4-19.** (a)-(b) I assume that the BMC at the beginning and the end of the route is the same BMC, and that this is an intra-BMC contract.

According to Ms. Nieto's response to FGFS/USPS-T2-10 (Tr. 7/3256), highway contract routes generally have multiple trips specified within them. According to Ms. Nieto, the BMC to SCF1 to SCF2 movement on an intra-BMC contract would be one route trip, and the movement from SCF2 to the BMC would be a separate route trip (Tr.7/3454). Ms. Nieto noted that when the last stop on a route trip is a BMC, the movement is inbound; otherwise, it is outbound (Tr. 7/3456). As such, the first and second legs in the round trip identified above would be defined as outbound, and the last leg would be defined as inbound.

**ANSWER OF UNITED PARCEL SERVICE  
WITNESS LUCIANI TO INTERROGATORY OF  
THE UNITED STATES POSTAL SERVICE**

**USPS/UPS-T4-20.** Have you studied postal highway capacity utilization as it operated prior to dropship discounts? If so, please provide any such studies and any results.

**Response to USPS/UPS-T4-20. No.**

**ANSWER OF UNITED PARCEL SERVICE  
WITNESS LUCIANI TO INTERROGATORY OF  
THE UNITED STATES POSTAL SERVICE**

**USPS/UPS-T4-21.** Please provide all estimates you have of the percent of inbound space utilized on intra-SCF and inter-SCF vehicles prior to the introduction of dropshipping.

**Response to USPS/UPS-T4-21.** I assume the question means prior to the introduction of dropship discounts. See my response to USPS/UPS-T4-20.

**DECLARATION**

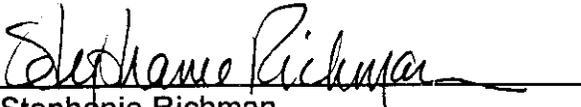
I, Ralph L. Luciani, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

*Ralph L. Luciani*  
\_\_\_\_\_  
Ralph L. Luciani

Dated: **February 5, 1998**

**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.

  
Stephanie Richman

Dated: February 6, 1998  
Philadelphia, PA