

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION

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DOCKET NO. R97-1

POSTAL RATE AND FEE CHANGES, 1997

**FOLLOW-UP INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE  
(USPS/UPS-42 THROUGH 43)**

(February 17, 1998)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to the United States Postal Service (USPS/UPS-42 through 43).

Respectfully submitted,



John E. McKeever  
Attorney for United Parcel Service

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Of Counsel.

**INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE**

**UPS/USPS-42.** Please refer to your response to interrogatory  
UPS/USPS-T28-45.

(a) Refer to part (a) of your response. Please confirm that USPS LR-H-327 currently overstates the outgoing mail processing costs avoided by DBMC parcel post. If not confirmed, please explain.

(b) Refer to part (c) of your response. Please confirm that the file cstshape.xls is not contained in USPS LR-H-315, but rather in LR-H-320. If not confirmed, please explain.

(c) Refer to part (f) (iii) of your response. Please provide an exact page number indicating where the value of \$15,988,000 was obtained.

(d) Refer to part (g) (iii) of your response. Please provide an exact page number indicating where the value of \$216,000 was obtained.

(e) Refer to part (h) (iii) of your response. Please provide an exact page number indicating where the value of \$859,000 was obtained.

(f) Refer to part (i) (iii) of your response. Please provide an exact page number indicating where the value of \$72,235,000 was obtained.

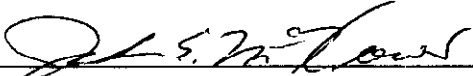
**UPS/USPS-43.** Please refer to your response to interrogatory  
UPS/USPS-T28-46.

(a) Confirm that the file cstshape.xls was included in USPS LR-H-320.

(b) Please provide the exact page where the values in "Column 10" of USPS LR-H-323 can be found. If this is not possible, please explain in full.

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.

  
\_\_\_\_\_  
John E. McKeever

Dated: February 17, 1998  
Philadelphia, PA