

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**ELEVENTH SET OF INTERROGATORIES FROM UNITED PARCEL
SERVICE TO UNITED STATES POSTAL SERVICE WITNESS MAYES
(UPS/USPS-T37-57 through 62)**

(September 8, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Mayes (UPS/USPS-T37- 57 through 62).

Respectfully submitted,



John E. McKeever
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Of Counsel.

**UNITED PARCEL SERVICE ELEVENTH SET OF INTERROGATORIES
TO UNITED STATES POSTAL SERVICE WITNESS MAYES**

UPS/USPS-T37-57. Please refer to your response to UPS/USPS-T37-15, and to DMM section E652.

- (a) Please confirm that in order for mailings presented to DMUs at a mailer's plant to be eligible for DBMC rates, the mailer must provide transportation to the dropship point at all times. If not confirmed, please explain.
- (b) Please provide a detailed explanation of how mail presented to the Postal Service, at the origin post office BMEU serving the mailer's plant under an authorized plant-verified drop shipment postage payment system, can be eligible for DBMC rates. Please include an example to support your answer and identify who is responsible for providing transportation to the BMEU and DBMC.

UPS/USPS-T37-58. Please refer to your response to UPS/USPS-T37-15, and to DMM section E652. For a qualified DBMC mailing dropshipped by a mailer at the Chicago BMC, please explain whether a mailer could designate any one of the following facilities as the entry facility and use the zone chart for that facility to calculate postage (assuming all parcels destinating in the service area for each facility below):

- (a) Palatine, IL SCF
- (b) South Suburban SCF, IL
- (c) Chicago, IL 60607-9998, Post office
- (d) Wausau, WI SCF
- (e) Iron Mountain, MI SCF
- (f) Gary, IN, SCF.

**UNITED PARCEL SERVICE ELEVENTH SET OF INTERROGATORIES
TO UNITED STATES POSTAL SERVICE WITNESS MAYES**

UPS/USPS-T37-59. Please refer to your response to UPS/USPS-T37-15, and to DMM section E652. Please provide a copy of the zone chart for each Parent Post Office listed in Exhibit 1.5 to DMM section E652 (BMC/ASF Parent Post Offices), and identify the Parent Post Office and zone chart number if not already identified.

UPS/USPS-T37-60. Please refer to your response to UPS/USPS-T37-15, and to DMM section E652.

- (a) Does all mail have to be verified before being dropshipped at a DBMC to get DBMC rate mailings? Explain your answer.
- (b) Can dropship mail for DBMC rate mailings be verified before dropshipping at the DBMC at locations other than DMUs? If yes, please identify and describe all of those types of facilities. If no, explain your answer.
- (c) Please confirm that for plant and BMEU authorized plant verified drop shipments at a DBMC for DBMC-rate mailings, the DBMC rechecks verification before acceptance. If not confirmed, explain your answer.

UPS/USPS-T37-61. Please provide a copy of all publications, brochures, directives, manuals, forms, packets, and other information that would be provided to a mailer inquiring about Postal Service DBMC Parcel Post Service.

UPS/USPS-T37-62. Please specify the areas in your Workpapers where DSCF rates are identified or calculated.

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.

A handwritten signature in black ink, appearing to read 'A.P. Parker, II', is written over a horizontal line.

Albert P. Parker, II

Dated: September 8, 1997
Philadelphia, PA