

BEFORE THE  
POSTAL RATE COMMISSION

RECEIVED  
Jan 21 9 24 AM '00

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

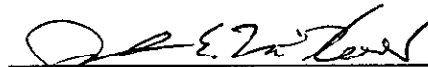
\_\_\_\_\_  
POSTAL RATE AND FEE CHANGES, 2000 :  
\_\_\_\_\_  
:

DOCKET NO. R2000-1

\_\_\_\_\_  
FIRST SET OF INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS EGGLESTON  
(UPS/USPS-T26-1 through 3)  
(January 21, 2000)  
\_\_\_\_\_

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 Eggleston (UPS/USPS-T26-1 through 3).

Respectfully submitted,



\_\_\_\_\_  
John E. McKeever  
William J. Pinamont  
Phillip E. Wilson, Jr.  
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe L.L.P.  
3400 Two Logan Square  
18th & Arch Streets  
Philadelphia, PA 19103-2762  
(215) 656-3310  
(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW  
Washington, DC 20036-2430  
(202) 861-3900

Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS EGGLESTON

UPS/USPS-T26-1. Provide a copy of all minutes of meetings, reports, memoranda, or other documents generated since January 1, 1999, to the present by or on behalf of the Drop Shipment Appointment System workgroup of the Mailers' Technical Advisory Committee.

UPS/USPS-T26-2. (a) Provide, separately for (i) all Standard Mail (B), and (ii) Standard Mail (B) Parcel Post, all information concerning the volume of mail that was "deposited at the wrong postal facility, forcing the Postal Service to reroute the mail to the proper facility." See 64 Fed. Reg. 71702 (December 22, 1999).

(b) Provide a listing of all occasions since January 10, 1999, to the present when DDU rate Standard Mail (B) Parcel Post was deposited at the wrong postal facility.

(c) Indicate the additional costs incurred by the Postal Service in rerouting to the proper facility DDU rate Standard Mail (B) Parcel Post deposited at the wrong postal facility at any time from January 10, 1999, to the present.

(d) Provide all reports, memoranda, or other documents (not including any documents generated by mailers) relating or referring to the deposit of DDU rate mail of any Standard Mail (B) subclass or rate category deposited at the wrong postal facility at any time between January 10, 1999, and the present.

(e) In instances where the Postal Service "reroute[d] [such] mail to the proper facility," did the Postal Service ever provide the transportation to the proper facility, or was that transportation performed by the mailer?

INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS EGGLESTON

(f) When the Postal Service was forced to "reroute [such] mail to the proper facility," had any of the mail been unloaded at the incorrect facility before discovering that the mail should be rerouted? If so, did Postal Service personnel conduct any of the unloading and/or the subsequent re-loading of the mail for routing to the proper facility?

(g) State the number of times from January 10, 1999, to the present that a mailer was "directed to transport destination entry rate mailings to a facility other than the designated DDU, SCF, or BMC due to facility restrictions, building expansions, peak season mail volumes, or emergency constraints" (see 64 Fed. Reg. 71702, 71703, ¶ 4.6), and provide the volume of Standard Mail (B) Parcel Post involved in all such instances combined.

(h) Provide any memoranda, reports, studies, or other documents concerning (1) the cost of scheduling appointments for the drop shipment of Standard Mail (B) mail at postal facilities, or (2) the cost of canceling, of re-scheduling, or of mailers' failures to keep scheduled appointments for the drop shipment of such mail.

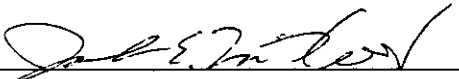
UPS/USPS-T26-3. (a) Provide copies of all studies, reports, memoranda, quality control procedures, quality control performance results, and other documents concerning the deposit, acceptance, adherence to postal requirements, or other aspects of destination entry mailings (i) for Standard Mail (B) in general, and (ii) separately for Standard Mail (B) Parcel Post in particular.

INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS EGGLESTON

(b) Provide all information relating to the cost of performing quality control audits, inspections, or other procedures related to the deposit or acceptance of Standard Mail (B) generally or Standard Mail (B) Parcel Post in particular. See 65 Fed. Reg. 141 (January 3, 2000).

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

  
\_\_\_\_\_  
John E. McKeever  
Attorney for United Parcel Service

Dated: January 21, 2000  
Philadelphia, Pa.