

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 2000 :  
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DOCKET NO. R2000-1

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INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS KINGSLEY  
(UPS/USPS-T10-7 AND 8)  
(February 16, 2000)  
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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 Kingsley: UPS/USPS-T10-7 and 8.

Respectfully submitted,



\_\_\_\_\_  
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Of Counsel.

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

UPS/USPS-T10-7. (a) Describe what postal personnel are instructed to do when a mailer presents a Parcel Post DBMC, DSCF, or DDU mailing at a postal facility, including a description of all acceptance activities performed by the Postal Service, and provide copies of any and all procedures, manuals, guidelines, instructions, directives, or other documents concerning the acceptance of Parcel Post DBMC, DSCF, or DDU mailings.

(b) Describe what steps postal personnel take to verify the accuracy of a mailing statement prepared by the mailer when a mailer presents a Parcel Post DBMC, DSCF, or DDU mailing at a postal facility, and provide copies of any and all procedures, manuals, guidelines, instructions, directives, or other documents concerning the verification of the accuracy of the mailing statement, including the verification of the volume information (pieces and weight) indicated on the mailing statement.

(c) Describe what quality control measures, including any periodic audits or inspections, the Postal Service takes to ensure that postal employees are properly accepting Parcel Post DBMC, DSCF, and DDU mailings and properly verifying the information on the mailing statement, and provide copies of any and all procedures, manuals, guidelines, instructions, directives, or other documents concerning such quality control measures.

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

UPS/USPS-T10-8. Please refer to the answer to interrogatory DFC/USPS-3.

Attached to that answer is a copy of a 1998 memorandum which contains "Sunday Collection and Outgoing Mail Processing Guidelines."

(a) Are the policies and practices established in those Guidelines still in effect?

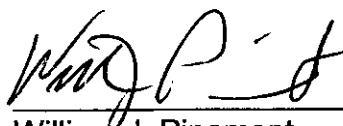
(b) List all operations that are conducted on Sundays and indicate in the case of each operation the class or classes of mail for which those operations are conducted.

(c) Are postal personnel paid more for working on Sundays than for working on other days? If so, indicate the premium or premiums the Postal Service pays its personnel who work on Sundays.

(d) Are the costs of Sunday operations accounted for separately from the costs incurred on other days of the week? If so, identify all accounts in which such costs are recorded and the BY 1998 costs in each such account.

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.



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William J. Pinamont  
Attorney for United Parcel Service

Dated: February 16, 2000  
Philadelphia, Pa.

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