

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

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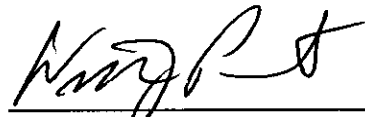
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INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS TOLLEY  
(UPS/USPS-T6-10 and 11)  
(February 16, 2000)

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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 Tolley: UPS/USPS-T6-10 and 11.

Respectfully submitted,



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

Piper Marbury Rudnick & Wolfe LLP  
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 TOLLEY

UPS/USPS-T6-10. Refer to page 25 of your testimony, where you discuss the Household Diary Study. Other than the Household Diary Study, has the Postal Service done, does it have, or is it aware of, any studies, reports, summaries, or surveys prepared since January 1, 1995, of the usage or relative usage of the different classes of mail by households? If so, provide a copy of all such studies, reports, summaries, or surveys.

UPS/USPS-T6-11. Refer to USPS-LR-I-182 (the PricewaterhouseCoopers report entitled, "Projecting Electronic Diversion for First-Class Mail in the H.R. 22 Simulation Model," dated February 7, 2000) and the sources noted therein.

- (a) Provide a copy of Faulkner's (FACCTS), "Electronic Bill Presentment & Payment" (Nov. 1999).
- (b) Provide a copy of the McKinsey Quarterly, "Electronic bill payment and presentment" (1998 No. 4).
- (c) Provide a copy of the Forrester Research document entitled, "Bill Presentment's Late Delivery" (Sept. 1999).
- (d) Provide a copy of the GartnerGroup document entitled, "Consumer Adoption of EBPP" (April 1999).
- (e) Provide a copy of PricewaterhouseCoopers' analysis/interpretation of the Forrester Research report, "Bill Presentment's Late Delivery."
- (f) Provide a copy of The Yankee Group report entitled, "Electronic Bill Presentment and Payment" (Feb. 1999).

INTERROGATORIES OF UNITED PARCEL SERVICE  
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(g) Provide a copy of the Forrester Research report entitled, "The  
Email Marketing Dialogue" (Jan. 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.



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William J. Pinamont  
Attorney for United Parcel Service

Dated: February 16, 2000  
Philadelphia, Pa.