## BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY (UPS/USPS-T10-9) (February 29, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Kingsley: UPS/USPS-T10-9.

Respectfully submitted,

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Attorneys for United Parcel Service

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Of Counsel.

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

UPS/USPS-T10-9. Refer to Library Reference USPS-LR-176.

- (a) For FY 1998 data, what proportion (and number) of mailing postage statements were submitted without PS Form 8125 for DBMC Parcel Post?
- (b) For FY 1998 data, what proportion (and number) of mailing postage statements were submitted without PS Form 8125 for all other DBMC mail categories? Provide this information by mail category and subclass.
- (c) Explain in detail why PS Form 8125 would not be submitted with mailing postage statements for a given DBMC transaction.
- (d) If mailing postage statements are submitted by the mailer without PS Form 8125, what is done to correct this error? If nothing, explain in detail why.
- (e) Explain in detail the process by which information listed on PS Form 8125 is matched with mailing postage statement data.
- (f) Explain in detail the process by which information listed on PS Form 8125 and mailing postage statements is verified against the characteristics of the mail pieces provided in the transaction (i.e., that mailer claimed discounts match discounts allowed for each transaction).
- (g) If errors are discovered in verifying the data provided by the mailer in the mailing postage statements and PS Form 8125 and the actual characteristics of the mail in the transaction, what is done to correct them? Are the mailing postage statements and/or PS Form 8125 changed to reflect actual mail characteristics? If not, please explain in detail.

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- (h) In regard to FY 1998 data, what proportion (and number) of all Parcel Post mail was sampled for errors, either on PS Form 8125 or mailing postage statements? If sampling contained errors, what proportion (and number) of all Parcel Post mail sampled contained errors?
- (i) In regard to FY 1998 data, what proportion (and number) of all mail categories were sampled for errors, either on PS Form 8125 or mailing postage statements? Provide this information by mail class and subclass. What proportion (and number) of all mail categories sampled contained errors? Provide this information by mail class and subclass.
- (j) In regard to FY 1998 data, for all sampled transactions, what proportion (and number) of transactions were discovered to have discounts claimed on PS Form 8125 or the mailing postage statement that should not have been taken by the mailer? Provide this information by mail class and subclass.
- (k) Are PS Forms 8125 used in any way in the BRPW systems? If so, explain how they are used and for what purpose.
- (I) Are PS Forms 8125 ever used in place of mailing postage statement data for entry into the Permit System and ultimately in the BRPW system? If so, what proportion of all FY 1998 records used in the Permit system and BRPW system were from PS Form 8125 versus mailing postage statements? Provide this information by mail class and subclass.

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(m) Is PS Form 8125 information maintained on any Postal Service information system? If so, which one? Are the data from this system used in the BRPW system? If so, explain in detail how it is used.

#### 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.

William J. Pinamont

Attorney for United Parcel Service

Dated: February 29, 2000

Philadelphia, Pa.

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