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 EGGLESTON (UPS/USPS-T26-10 through 15) (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

Eggleston: UPS/USPS-T26-10 through 15.

Respectfully submitted,

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 EGGLESTON

UPS/USPS-T26-10. Confirm that Parcel Post plant-verified dropshipped mail must pass through both a verification procedure prior to transportation by the mailer to the destination-entry point and an acceptance procedure at the destination-entry point. If not confirmed, explain in detail.

UPS/USPS-T26-11. Confirm that under both the verification procedure and under the acceptance procedure the entire dropshipment must be examined. If not confirmed, explain in detail.

UPS/USPS-T26-12. Explain in detail the cost category in which the verification costs for Parcel Post plant-verified dropshipped mail are included, and provide the actual costs for this procedure in the Base Year.

UPS/USPS-T26-13. Explain in detail the cost category in which the acceptance costs for Parcel Post plant-verified dropshipped mail are included, and provide the actual costs for this procedure in the Base Year.

UPS/USPS-T26-14. Provide all available information with respect to the percentage of Parcel Post dropshipped mail that is plant-verified.

UPS/USPS-T26-15. Explain in detail:

(a) What you believe to be the relationship between the verification and acceptance costs for intra-BMC and inter-BMC mail in comparison to the verification and acceptance costs of dropshipped mail.

(b) How the proposed Parcel Post dropship cost savings take into account this relationship.

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CERTIFICATE OF SERVICE

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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

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Dated: February 29, 2000 Philadelphia, Pa.

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