

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF  
UNITED PARCEL SERVICE,  
REDIRECTED FROM WITNESS TOLLEY  
(UPS/USPS-T6-11)

The United States Postal Service hereby provides its response to the following interrogatories of United Parcel Service: UPS/USPS-11, filed on February 16, 2000, and redirected from witness Tolley. An objection was filed to UPS/USPS-T6-10 on February 28, 2000.

The interrogatory is stated verbatim and is followed by the response..

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992, Fax -5402  
March 1, 2000

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF UNITED PARCEL SERVICE  
(REDIRECTED FROM WITNESS TOLLEY)**

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).
- (g) Provide a copy of the Forrester Research report entitled, "The Email Marketing Dialogue" (Jan. 2000).

**RESPONSE:**

The source documents for the PricewaterhouseCoopers report are produced by organizations other than the Postal Service, and are not under the control of the Postal Service. To avoid potential contractual complications, copies of those documents should be obtained from the originating organization. Addresses and phone numbers are provided as an attachment to assist in that effort.

Attachment  
Response to  
UPS/USPS-T6-11

Faulkner Information Services  
114 Cooper Center  
7905 Browning Road  
Pennsauken, NJ 08109-4319  
Tele. – 856-662-2070

McKinsey & Company  
600 Fourteenth Street, NW  
Suite 300  
Washington, DC 20005-2000  
Tele. – 202-662-3100

Forrester Research, Inc.  
400 Technology Square  
Cambridge, MA 02139-3560  
Tele. – 617-497-7090

The GartnerGroup  
3190 Fairview Pk Dr  
Suite 100  
Falls Church, VA 22042-4510  
Tele. – 703-645-3846

PricewaterhouseCoopers LLP  
1301 Avenue of the Americas  
New York, NY 10019-6022  
Tele. – 212-707-6000

The Yankee Group  
31 St. James Avenue  
Boston, MA 02116-4100  
Tele. – 617-956-5000

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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Eric P. Koetting

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