

BEFORE THE  
POSTAL RATE COMMISSION

RECEIVED

MAR 6 12 42 PM '00

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

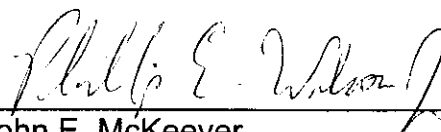
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL  
SERVICE TO UNITED STATES POSTAL  
SERVICE WITNESS DEGEN  
(UPS/USPS-T16-5 through 6  
(March 6, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby  
serves the following interrogatories directed to United States Postal Service witness  
Degen: UPS/USPS-T16-5 through 6.

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 DEGEN

UPS/USPS-T16-5. Refer to page 36 of your testimony, where you state that "most primary parcel sortation occurs in BMCs." Refer also to page 44 of your testimony, where you state that "[o]utgoing parcels are sent to the BMC without any sortation." Refer also to page 45 of your testimony, where in your discussion of Manual Flat Sortation and the Small Parcel Bundle Sorter ("SPBS"), you state that "The SPBS sorts parcels and bundles when the keyers enter a numeric code--the first few digits of the ZIP Code for an outgoing scheme . . . ." Explain this apparent contradiction.

UPS/USPS-T16-6. Refer to pages 32 through 34 of your testimony, where you indicate that the standard operating plan for the piece sortation of letters begins with cancellation and culling of automation incompatible letters from the mailstream. Automation incompatible letters are then either sorted manually or sorted on a letter sorting machine ("LSM"). Automation compatible pieces are sent either directly to the bar code sorter ("BCS") or are diverted into various processing streams that prepare them for eventual sortation by the BCS.

(a) Confirm that under the standard operating plan, all the actual sortation of letters is performed either manually, by an LSM, or by a BCS. If not confirmed, identify all of the other operations in which letters are sorted, and describe the types and approximate percentages of mail sorted in these other ways.

(b) Specify the number of times under the standard operating plan that a specific letter at a specific processing plant would be processed either manually, through an LSM, or through a BCS before leaving the plant.

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

(c) If the answer to (b) varies either from letter to letter or from plant to plant, indicate the minimum number of times a letter would be processed in one of these three operations under the standard operating plan, and the maximum number of times it would be processed.

(d) If the answer to (b) above varies either from letter to letter or from plant to plant, describe the circumstances and conditions that determine how many times a letter would be processed.

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.

A handwritten signature in black ink, appearing to read "Phillip E. Wilson, Jr.", written over a horizontal line.

Phillip E. Wilson, Jr.  
Attorney for United Parcel Service

Dated: March 6, 2000  
Philadelphia, Pa.