

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

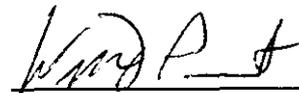
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS FROM UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS HUNTER  
(UPS/USPS-T5-27 through 29)  
(March 13, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and request for production of documents directed to United States Postal Service witness Hunter: UPS/USPS-T5-27 through 29.

Respectfully submitted,



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Of Counsel

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

UPS/USPS-T5-27. Refer to Library Reference USPS-LR-I-44. For FY1998 provide a copy of a report generated from the Permit System showing the total volume for Parcel Post, separately for (i) Inter-BMC, (ii) Intra-BMC, and (iii) DBMC.

UPS/USPS-T5-28. Provide a copy of any audit results concerning the accuracy or inaccuracy of BY 1998 postage statements.

(a) Explain whether each such audit provides for verification procedures of actual mail delivered by the mailer against what was indicated by the mailer on the postage statement. If so, describe these procedures.

(b) Explain whether each such audit determines the number of errors discovered by mail class, subclass and error type. If so, provide the results of all such determinations.

(c) Include all documents and analyses related to each such audit.

(d) If an audit was not performed, explain in detail why not.

UPS/USPS-T5-29. Refer to Tables 1-3 of your testimony covering FY 1998. Provide detailed tables for FY 1998 in similar format, by subclass for each mail class, including Inter-BMC, Intra-BMC, and DBMC revenue, piece, and weight estimates.

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: March 13, 2000  
Philadelphia, Pa.

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