

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 ROBINSON
(UPS/USPS-T34-18 through 29)
(March 17, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Raymond: UPS/USPS-T34-18 through 29.

Respectfully submitted,



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Of Counsel.

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

UPS/USPS-T34-18. Using ODIS data, provide separately the portion of FY1999

Priority Mail volume sent within:

- (a) a one-day service area that arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

UPS/USPS-T34-19. Using PETE data, provide separately the portion of FY1999

Priority Mail volume sent within:

- (a) a one-day service area that was actually delivered:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that was actually delivered:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and

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- (c) a three-day service area that was actually delivered:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

UPS/USPS-T34-20. Using EXFC data, provide the portion of FY1999 First-Class

Mail volume sent within:

- (a) a one-day service area that was actually delivered:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that was actually delivered:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that was actually delivered:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

UPS/USPS-T34-21. Provide separately the average length of haul for First-

Class Mail within the following service areas:

- (a) one-day;
- (b) two-days;
- (c) three days.

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UPS/USPS-T34-22. Provide the average length of haul for Priority Mail within the following service areas:

- (a) one-day;
- (b) two-days;
- (c) three days.

UPS/USPS-T34-23. Provide the volume of Priority Mail by ounce increment for BY1998.

UPS/USPS-T34-24. Provide the volume of Priority Mail by ounce increment for FY1999.

UPS/USPS-T34-25. Confirm that one-day service Priority Mail has an overnight service commitment or standard identical to that for First-Class Mail. If you do not confirm, explain how they differ and the extent of the difference.

UPS/USPS-T34-26. Describe and quantify all improvements in Priority Mail service performance since FY1996.

UPS/USPS-T34-27. Describe and quantify all improvements in First-Class Mail service performance since FY1996.

UPS/USPS-T34-28. For each quarter in BY1998 and FY1999, provide copies of the Service Performance Quarterly Reports for First-Class Mail based on the EXFC service performance measurement system.

UPS/USPS-T34-29. For each quarter in BY1998 and FY1999, provide copies of the Service Performance Quarterly Reports or the equivalent for Priority Mail based on:

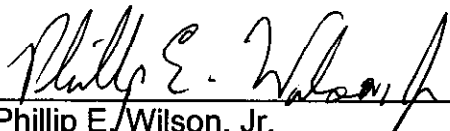
- (a) the ODIS service performance measurement system; and

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- (b) the PETE service performance measurement system.

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.


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

Dated: March 17, 2000
Philadelphia, Pa.

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