

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED
MAR 21 11 06 AM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

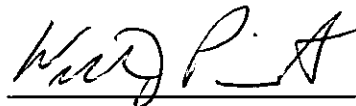
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS HUNTER
(UPS/USPS-T5-31 through 34)
(March 21, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Hunter: UPS/USPS-T5-31 through 34.

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 HUNTER

UPS/USPS-T5-31. What document or documents are the source of the information included in the BRPW system? If there are different documents depending on the nature of the post office where a bulk shipment is accepted (e.g., one source for automated offices, a different source for non-automated offices, etc.) or on the basis of whether the shipment is plant-verified or not, or on any other basis, identify for each situation the source of the information used in the BRPW system.

UPS/USPS-T5-32. In the case of a plant-verified dropshipment, is the information for the BRPW system taken from (a) the postage or mailing statement, (b) Form 8125 (or any variation thereof), or (c) from some other source? If the answer is (c), identify the source.

UPS/USPS-T5-33. Refer to your response to interrogatory NNA/USPS-T5-14(b)-(c).

(a) Provide the number of instances during the period from FY1995 through FY1999 that a mailer lost entry privileges as a result of noncompliance with PERMIT entry requirements.

(b) Provide the number of instances during the period from FY1995 through FY1999 that the Postal Service instituted civil proceedings, whether administrative or in the courts, against mailers as a result of noncompliance with PERMIT entry requirements. Do not include any instances already included in the response to paragraph (a), above.

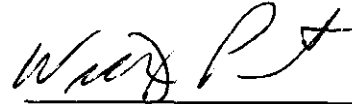
INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS HUNTER

(c) Provide the number of instances during the period from FY1995 through FY1999 that the Postal Service has sought criminal penalties against a mailer for failure to comply with PERMIT entry requirements.

UPS/USPS-T5-34. Refer to your response to NNA/USPS-T5-7. When was the last time that the panel of sampled offices was "refreshed"?

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.



William J. Pinamont
Attorney for United Parcel Service

Dated: March 21, 2000
Philadelphia, Pa.

60652