

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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: POSTAL RATE AND FEE CHANGES, 2000 :  
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DOCKET NO. R2000-1

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INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS FROM  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS KINGSLEY  
(UPS/USPS-T10-22 through 32)  
(March 21, 2000)

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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 Kingsley: UPS/USPS-T10-22 through 32.

Respectfully submitted,



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Of Counsel.

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UPS/USPS-T10-22. Refer to USPS-LR-I-176, page 4, which states: "We also found that customers did not use the proper form. Of the 2486 forms reviewed, 578 were outdated." Provide, separately, the total number of PS Forms 8125 processed by the Postal Service for:

- (i) FY1998, and
- (ii) FY1999.

UPS/USPS-T10-23. Refer to USPS-LR-I-176, page 4, which states: "We found that USPS customers often failed to complete the following items in section one, mailer information, of PS Form 8125 . . . ." (footnote omitted).

(a) Provide the number of PS Forms 8125 that did not indicate the "class of mail and product name."

(b) Provide the number of PS Forms 8125 that did not provide "processing category and entry discounts."

UPS/USPS-T10-24. Refer to USPS-LR-I-176, page 6, which provides: "plant-verified dropshipments were accepted at destination entry facilities without a related PS Form 8125 or with inconsistencies between the PS Form 8125 provided and the mail as presented to USPS acceptance personnel." In the case of each form where there was an inconsistency between the PS Form 8125 and the mail as presented, provide the form (with mailer and facility information redacted) and the nature and extent of the inconsistency (including the actual volume presented vs. the volume shown on the form, where the inconsistency relates to volume information).

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UPS/USPS-T10-25. Refer to USPS-LR-I-176, page 9, which states, "These standards will be contained in Publication 804, *Dropship Guidelines for Destination Entry*, which will be printed and distributed in January 2000." Provide a copy of these guidelines.

UPS/USPS-T10-26. In the case of a plant-verified dropshipment, does the Postal Service weigh the entire mailing, either at the mailer's plant or at the post office where the mail is accepted, prior to accepting the mail? If so, is that done in all cases, or only in some cases? If it is done only in some cases, provide or describe any guidelines concerning how often or when the entire mailing should be weighed.

UPS/USPS-T10-27. In the case of a dropshipment other than a plant-verified dropshipment, does the Postal Service weigh the entire mailing prior to accepting the mail? If so, is that done in all cases, or only in some cases? If it is done only in some cases, provide or describe any guidelines concerning how often or when the entire mailing should be weighed.

UPS/USPS-T10-28. Refer to the letter dated September 28, 1999, from Mr. Richard F. Chambers to Ms. Anita J. Bizzotto and Mr. John A. Rapp which appears after the cover page of Library Reference USPS-LR-I-176. That letter indicates that the report on the plant-verified dropshipment system "responds to a request from the Chief Operating Officer and Executive Vice President to review the drop shipment system." Indicate what led to the "request from the Chief Operating Officer and Executive Vice President to review the drop shipment system."

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UPS/USPS-T10-29. Provide copies of all annual reports, or any other reports, on the Postal Service's Revenue Assurance Program, or on any other Postal Service revenue assurance or revenue protection program, for FY1998 and FY1999.

UPS/USPS-T10-30. Refer to page 2 of USPS-LR-I-176, which indicates that "three processing and distribution centers that were located in cities that also contained a bulk mail center" were judgmentally selected for the study (footnotes omitted).

(a) At the time the study was done, how many "processing and distribution centers . . . were located in cities that also contained a bulk mail center"?

(b) Why was the selection limited to processing and distribution centers "that were located in cities that also contained a bulk mail center"?

(c) At the time the study was conducted, how many processing and distribution centers were there, regardless of whether those centers "were located in cities that also contained a bulk mail center"?

(d) Describe the difference between "bulk mail entry personnel" and "USPS verification and acceptance personnel" referred to on that same page, and describe the duties of each.

UPS/USPS-T10-31. How many facilities in total were visited in performing the audit that is the subject of USPS-LR-I-176, and what percentage of all eligible facilities does that number represented?

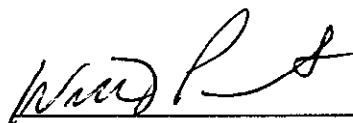
UPS/USPS-T10-32. Refer to page 6 of USPS-LR-I-176, which indicates that "USPS personnel accepted mail without a PS Form 8125 or with a PS Form 8125

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containing incorrect information." Provide copies of all PS Forms 8125, all mailing or postage statements, and all other documents examined in connection with the audit that is the subject of this library reference, including any notes taken by the investigators or auditors. Any information that would identify a mailer or a facility may be redacted.

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 21, 2000  
Philadelphia, Pa.

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