

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

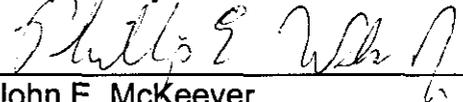
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS FROM UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS RAYMOND  
(UPS/USPS-T13-10 through 14)  
(March 22, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Raymond: UPS/USPS-T13-10 through 14.

Respectfully submitted,

  
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Phillip E. Wilson, Jr.  
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Of Counsel.

INTERROGATORIES AND REQUEST FOR PRODUCTION OF  
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UPS/USPS-T13-10. Provide a definition of "parcel," including size, cubic volume, and class of mail (if applicable), as used in the Engineered Standards Database. Provide supporting materials for your definition, such as training manuals or any other documentation.

UPS/USPS-T13-11. How does the carrier decide if a parcel is going to be a *deviation parcel delivery*?

UPS/USPS-T13-12. Describe any standards, criteria, or guidelines with respect to weight and/or cubic volume of a parcel(s) regarding when a carrier should make a deviation delivery. If these are written, provide a copy of them.

UPS/USPS-T13-13. What are the guidelines in regard to size or shape for a *deviation parcel delivery*? If there are written guidelines, provide a copy of them.

UPS/USPS-T13-14. In the initial survey design for the Engineered Standards project, were there discussions of "deviation" delivery runs for parcels? If so, provide any notes, memoranda, or other documentation that includes these discussions.

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

Dated: March 22, 2000  
Philadelphia, Pa.

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