

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

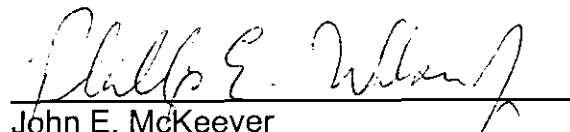
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS FROM UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS ROBINSON
(UPS/USPS-T34-30 through 34)
(March 22, 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 Robinson: UPS/USPS-T34-30 through 34.

Respectfully submitted,



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William J. Pinamont
Phillip E. Wilson, Jr.
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Of Counsel.

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

UPS/USPS-T34-30. For BY1998, provide the portion of the total volume of Priority Mail pieces for which the customer purchased Delivery Confirmation service.

UPS/USPS-T34-31. For FY1999, provide the portion of the total volume of Priority Mail pieces for which the customer purchased Delivery Confirmation service.

UPS/USPS-T34-32. For TY2001, provide the portion of the total volume of Priority Mail pieces for which the customer is expected to purchase Delivery Confirmation service.

UPS/USPS-T34-33. Using Delivery Confirmation data, provide separately the portion of FY1999 Priority Mail volume sent within:

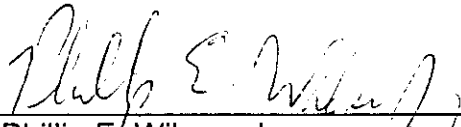
- (a) the one-day service area for Priority Mail that actually arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) the two-day service area for Priority Mail that actually arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) the three-day service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

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

UPS/USPS-T34-34. For each quarter in BY1998 and FY1999, provide copies of any Priority Mail service performance reports (similar to Quarterly Statistics Reports from the Origin-Destination Information System) based on Delivery Confirmation data.

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 22, 2000
Philadelphia, Pa.

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