

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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NOTICE OF UNITED PARCEL SERVICE OF  
AGREEMENT ON PRODUCTION OF INFORMATION  
REQUESTED IN INTERROGATORY UPS/USPS-T16-4  
TO WITNESS DEGEN AND NOTICE OF WITHDRAWAL  
OF MOTION TO COMPEL  
(March 29, 2000)

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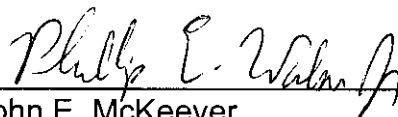
On February 23, 2000, United Parcel Service ("UPS") filed interrogatory UPS/USPS-T-16-4, directed to Postal Service Witness Degen, requesting the IOCS data file including all variables not relied upon to produce the CRA report. The Postal Service filed an objection to this interrogatory on March 3, 2000, in response to which UPS filed a motion to compel on March 16, 2000. On March 23, 2000, the Postal Service filed its Response and Opposition of United Postal Service to Motion of United Parcel Service to Compel Collection of Information Requested in Interrogatory UPS/USPS-T16-4 to witness Degen (Response).

In its Response, the Postal Service proposes to provide "an electronic file identifying each IOCS record that contains remarks from questions 21B, 21C, and 21D, the remark type, and the content of those remarks . . . within a few days in the form of an interrogatory response and supporting library reference." Response, at 1-2. The Postal Service will mask "sensitive information in the form of references to specific

employees or facilities, or information that might be construed as partaking of an overly personal nature." Response, at 2.

UPS is willing to accept an answer to UPS/USPS-T16-4 in the form proposed by the Postal Service. Therefore, UPS withdraws its March 16, 2000, motion to compel, and looks forward to the Postal Service's prompt response to interrogatory UPS/USPS-T16-4.

Respectfully submitted,



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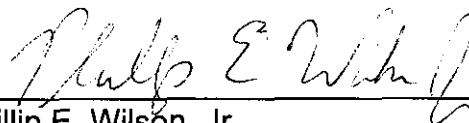
and

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Of Counsel.

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 29, 2000  
Philadelphia, Pa.

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