

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

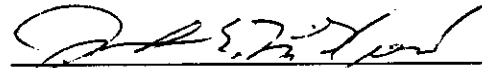
DOCKET NO. R2000-1

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE
(UPS/USPS-3 through 4)
(April 3, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby
serves the following interrogatories directed to the United States Postal Service:

UPS/USPS-3 through 4.

Respectfully submitted,



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UPS/USPS-3. Refer to the Cost and Revenue Analysis report, FY98 PRC Version-Revised (June 11, 1999), page 8, which indicates a volume of 266.5 million pieces for Standard Mail (B), Parcels (Zone Rate).

(a) Confirm that this volume estimate was based on DRPW data only (*i.e.*, did not use any data from the PERMIT system or from the BRPW system). If you do not confirm, explain why, and (i) indicate what portion of that volume estimate is based on data from a system other than the DRPW system, and (ii) provide the name of the system and how estimates under it were obtained for purposes of this Cost and Revenue Analysis report.

(b)(i) Provide a breakdown by inter-BMC, intra-BMC, and DBMC pieces of the estimate of 266.5 million pieces, and all data used to arrive at the breakdown, preferably in electronic format.

(ii) Provide a breakdown by inter-BMC, intra-BMC, and DBMC of the revenue and weight associated with the pieces provided in response to (b)(i), above, and all data used to arrive at these breakdowns, preferably in electronic format.

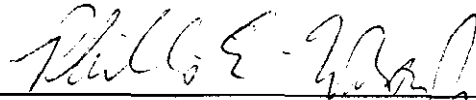
UPS/USPS-4. (a) In FY1998, did the Postal Service accept dropshipments of DBMC Parcel Post from mailers who did not participate in the PERMIT system? If so, provide the volume of Parcel Post pieces accepted by the Postal Service in FY1998 from such mailers and the associated revenue and weight for all such pieces, together with all data used to arrive at those figures, preferably in electronic format.

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(b) In FY1998, did the Postal Service accept dropshipments from mailers when postage was not paid by PERMIT imprint, but rather was paid by postage meters, precancelled stamps, uncanceled stamps, or any other forms of postage payment? If so, provide the volume of Parcel Post pieces accepted by the Postal Service in FY1998 from all such mailers and the revenue and weight associated with all such pieces, together with all data used to derive these figures, preferably in electronic format if available.

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: April 3, 2000
Philadelphia, Pa.

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