

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2000

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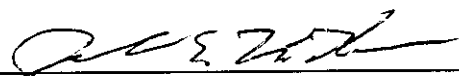
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FOLLOW-UP INTERROGATORIES OF UNITED  
PARCEL SERVICE TO UNITED STATES POSTAL  
SERVICE (REDIRECTED FROM WITNESS ROBINSON)  
(UPS/USPS-7 through 11)  
(April 10, 2000)

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby  
serves these follow-up interrogatories directed to the United States Postal Service:  
UPS/USPS-7 through 11.

Respectfully submitted,

  
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Of Counsel.

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TO UNITED STATES POSTAL SERVICE  
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UPS/USPS-7. Refer to the answer to UPS/USPS-T34-18(b) and (c). Explain why the sum of the percentages provided in the answers to each (b) (74 percent, 11 percent, 26 percent) and (c) (76 percent, 45 percent, 24 percent) is not 100%.

UPS/USPS-8. Refer to the answer to UPS/USPS-T34-19. Explain why the sum of the percentages provided in the answer to UPS/USPS-T34-19(b) (79.3 percent, 16.5 percent, 20.7 percent) is not 100%.

UPS/USPS-9. Refer to UPS/USPS-T34-20(b) and (c). Explain why the sum of the percentages provided in the answers to each of (b) (86.5 percent, 19.6 percent, 13.5 percent) and (c) (85.6 percent, 32.9 percent, 14.4 percent) is not 100%.

UPS/USPS-10. Refer to the "Priority End-to-End (PETE)" table provided in the response to UPS/USPS-T34-26.

(a) Explain why performance is systematically lower in PQ2 in FY1998 (82.73%, 60.77%) and in FY1999 (88.15%, 67.21%).

(b) Confirm that PQ2 includes the peak holiday delivery period (November-December). If you do not confirm, explain.

(c) Provide any report, study, or available data that explains the reasons for the increase in on-time performance from FY1996 to FY1999.

(d) Confirm that the overall improved performance of Priority Mail from FY1996 to FY1999 is due to a decrease in the volume or in the relative proportion of

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Priority Mail that consists of Parcels and an increase in the volume or in the relative proportion of Priority Mail that consists of flats. If not confirmed, explain.

(e) Provide a breakdown of the PETE data, % On Time Overnight

Commitment and % On Time 2-Day Commitment for FY1997, FY1998, and FY1999 for:

- (i) Priority Mail flats; and
- (ii) Priority Mail Parcels.

For each, provide the breakdown by originating and terminating zip code.

UPS/USPS-11. Refer to the ODIS QUARTERLY STATISTICS REPORTS, page 1-8, provided in the response to UPS/USPS-T34-26. For Priority Mail, provide the percentage of average estimated daily volume for PFY1996, PFY1997, and PFY1998 that is:

- (i) Flats;
- (ii) Parcels.

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: April 10, 2000  
Philadelphia, Pa.